

APPENDIX B

Agency Consultation and Coordination

Agency Scoping Meeting Summary

The New Pueblo Freeway Draft EIS Agency Scoping Meeting

ATTENDEES: See full list on page 2

LOCATION: FHWA 3rd Floor Conference Room, 555 Zang, Lakewood, Colorado

MEETING DATE: February 13, 2003

SUBJECT: New Pueblo Freeway

PROJECT: 158128; IM 0251-156; SA 12831

AUTHOR: Dirk D. Draper/CH2M HILL

INTRODUCTION

These meeting notes reflect the decisions and action items agreed on at this meeting. Please advise the Author as soon as possible if your meeting notes reflect any substantial differences from these notes.

On February 13, 2003, FHWA and CDOT hosted the Agency Scoping Meeting for the Draft Environmental Impact Statement (DEIS) of the New Pueblo Freeway. The meeting was held in the 3rd floor conference room of the FHWA office in Lakewood. The purpose of the meeting was to exchange information with resource management agencies about the project, and solicit feedback on the *Environmental Methodology Report* CH2M HILL has written for the project. The meeting began at 10 a.m. and lasted until 12:15 p.m.

INVITATION AND PARTICIPATION

CH2M HILL worked with FHWA and CDOT Region 2 to identify federal, state and local agency representatives to invite to the scoping and coordination meetings. The Table below lists individuals based in Denver and their participation at the Scoping Meeting. Invitations to the meeting were emailed by Chris Horn/FHWA, on Friday, January 31, 2003, with the *Environmental Methodology Report* and *Information Package* attached as PDF files. Written invitations were mailed to the same individuals the following week, along with copies of the same two documents. CH2M HILL called each individual by telephone on Monday and Tuesday, February 10-11, 2003, to remind them of the meeting and determine their intent to participate. Representatives from HUD were identified late in this process. Following several telephone calls during the week, email invitations were sent by CH2M HILL to two HUD representatives on Wednesday, February 12, 2003.

The project sponsors will hold an "Agency Coordination Meeting" in Pueblo on February 27, 2003, for local agencies. The email and letter invitations identified this meeting to all recipients for their convenience. Please refer to the separate Agency Coordination Meeting Summary from that event for more information.

PARTICIPANTS

Agency/Individual, Specialty	Invited	Attended
Federal and State Transportation Agencies		
FHWA/Charmaine Farrar, Manager	No	Yes
FHWA/Dennis Durbin, Environmental	Yes	Yes
FHWA/Chris Horn, Project Manager	Yes	Yes
FHWA/Monica Pavlik, Environmental	No	Yes
FHWA/Edrie Vinson, Environmental	Yes	No
CDOT Region 2/Dick Annand, RPEM	Yes	Yes
CDOT Region 2/Judy DeHaven, Environmental	Yes	Yes
CDOT Region 2/David Miller, Project Manager	Yes	Yes
CDOT EP/Mike Banovich, Landscape Architect	No	Yes
CDOT EP/Tom Boyce, Water Quality	Yes	No
CDOT EP/Dan Jepson, Cultural Resource Mgr-Archaeologist	Yes	Yes
CDOT EP/Gordon McEvoy, Water Quality	No	Yes
CDOT EP/Jerry Piffer, Air Quality, Environmental Justice	Yes	Yes
CDOT EP/Lisa Schoch, Historian	Yes	Yes
CDOT EP/Rebecca Vickers, Environmental Manager	Yes	No
CDOT EP/Steve Wallace, Paleontologist	Yes	Yes
Denver Resource Agencies		
Advisory Council on Historic Preservation/Don Klima, Manager	Yes	No
Army Corps of Engineers/Anita Culp, Floodplains	Yes	Yes
CDPHE/Air Pollution Control Division/Jim DiLeo, Air Quality	Yes	Yes
CDPHE/Solid Waste/Pat Martinek, Hazardous Materials	Yes	Yes
CDPHE/Water Quality/Kathleen Reilly, Water Quality	Yes	No
EPA/Sarah Fowler, 404 program	No	Yes
EPA/Debra Lebow, NEPA	Yes	Yes
FEMA/John Liou, Floodplains	Yes	Yes
Fish and Wildlife Service/Allison Michael, Listed species	Yes	Yes
HUD/Guadalupe Herrera, Environmental Justice	Yes	No
HUD/Howard Kutzer, Environmental Justice	Yes	No
SHPO/Dan Corson, Historical and Archaeological	Yes	No
Consultant Team in Attendance		
CH2M HILL/Bill Knapp, EIS Project Manager		
CH2M HILL/Dirk Draper, Environmental Planner		
CH2M HILL/Andrea Garcia, EIS Task Manager		
CH2M HILL/Mary Jo Vobejda, EIS Public Involvement Manager		

AGENDA

The agenda is attached and was followed in conducting the meeting.

DISPLAYS AND HANDOUTS

Bill Knapp/CH2M HILL Project Manager, conducted the majority of the first half of the meeting using a PowerPoint slide show that introduced participants to the project background and extensive development phase activities.

Mary Jo Vobejda/CH2M HILL Public Involvement Specialist, briefed the group on the public involvement strategies and activities that were conducted during the Feasibility Study. She highlighted the variety of methods used to engage the public in the decision making process that occurred during planning.

Bill Knapp provided an overview of the environmental issues that were discovered during the Feasibility Study and explained the reasons an EIS is warranted. Bill talked through the EIS schedule, which shows a completion date of December 2004 for a DEIS submittal.

Andrea Garcia/CH2M HILL EIS Task Manager, described FHWA and CDOT early agency coordination efforts. This included an October 7, 2002, field trip and informal resource agency briefings conducted in November and December 2002. She described the purpose of the *Environmental Methodology Report* and how it will be used to guide the EIS study process. She said that comments are being accepted on the report through March 13, 2003.

A number of maps and oversized figures were displayed at the meeting, including aerial photos overlain with map outlines of each alternative that were approximately 8 feet long, and one aerial photograph of the corridor that was approximately 12 feet long.

Participants at the meeting were provided with a meeting agenda and an 11" x 17" map of each of the three alternatives. A number of copies of the *Environmental Methodology Report* and *Info Package* were distributed at the meeting.

ACTION ITEMS

These action items were identified in the Agency Scoping meeting:

- CH2M HILL will send updated maps of the Existing I-25 Alignment Alternative to meeting participants.
- CH2M HILL will send copies of the agenda and 11x17 maps to agency representatives who were invited but unable to attend the Agency Scoping or Coordination meetings.
- CH2M HILL to change CDPHE contact to Kathleen Reilly and delete Bill McKee's name from the Contact List, and to delete Van Truan/Corps from the Contact List.
- EPA will provide CH2M HILL with examples of air toxins mitigation measures.
- Judy DeHaven/CDOT R2 will provide a copy of new CDOT noise guidance to CH2M HILL.
- Chris Horn/FHWA will provide FHWA guidance on Cumulative Impacts (February 2003) to CDOT and CH2M HILL.
- CH2M HILL to provide Steve Wallace, CDOT paleontologist with aerial photographs at 1" = 2000' scale for his fieldwork.
- Agency representatives will submit comments on the *Environmental Methodology Report* to Andrea Garcia/CH2M HILL by March 13, 2003.
- After March 13, 2003, CH2M HILL will revise the *Environmental Methodology Report* to reflect comments from FHWA, CDOT, and participants at the Scoping and Coordination meetings. Copies of the revised *Environmental Methodology Reports* will be provided to agency representatives on the Scoping Contact List.

DISCUSSION

During the hour-long question-and-answer session CH2M HILL recorded comments and questions on a display easel. The transcript of comments is attached. Much of the discussion focused on floodplains, air toxins, and secondary impacts.

Floodplains

John Liou/FEMA advised that numerous studies of Fountain Creek are underway; consistency is needed in approach and assumptions on all studies of Fountain Creek, including the New Pueblo Freeway. FEMA noted that revising the models of Fountain Creek's complex floodplains is a process further complicated by the interim status of hydrology modeling. John suggested that hydraulics modeling will be needed for 10 miles of Fountain Creek.

FEMA noted that its stringent floodway criteria and Executive Order 11988 on floodplains must be followed in planning the New Pueblo Freeway. COE/FEMA/PPACG need to define roles/responsibility among themselves, given the multiple concurrent studies and interim status of baseline data.

Bill Knapp confirmed that potential impacts to the floodplains were presented to the public during the initial project planning. He noted that additional analysis and results will be shared with public during the EIS.

Also see comment on indirect impacts in the Wetlands discussion, below.

Air Quality and Air Toxics

Chris Horn asked whether the *Environmental Methodology Report* section is too detailed for an attainment area. After discussion, participants agreed that further meetings are needed with FHWA, CDOT, EPA and APCD regarding the level of air quality analysis needed in Pueblo. CH2M HILL explained that existing I-25 through-lanes operate at Level of Service (LOS) C or better, while some existing interchanges along I-25 operate at LOS D or better. Future traffic operations (2025) are anticipated to operate at LOS F.

NEPA requires some discussion of conformity with limited hot spot analysis, given the forecast of LOS F. Jim DiLeo/APCD and Debra Lebow/EPA requested a qualitative statement on particulates in the DEIS, and suggested that standard language from those agencies be applied to the air quality analysis. EPA may not require heavy detailed analysis, but the agency does have mitigation measures to implement now, for example, requiring construction vehicles to use cleaner diesel fuel, and implement dust control measures.

EPA explained its position that air toxins are a more important topic than pollutants in Pueblo. Impacts from air-borne toxins could be an important element in a project's environmental justice evaluation if potential impacts are concentrated in specific neighborhoods and mitigation is not implemented. EPA cited the example that fugitive dust containing heavy metals is a concern, and may be an issue at the steel mill, especially when excavations occurs.

EPA is requiring that some mitigation measures for air toxins be addressed in the DEIS. The agency does have mitigation measures to implement now (for example I-70 East corridor an EPA/Denver City project) and will provide examples to CH2M HILL. CDOT does not currently have a department policy on air toxins.

Cultural and Paleontological Resources

Dan Jepson/CDOT EP, asked about the level of public interest in historic preservation in Pueblo, and what had been the level of involvement in public meetings. CH2M HILL described a high level of local pride and interest in cultural resources, and cited multiple local historical groups operating in Pueblo. CH2M HILL summarized attendance at the public participation events as consistently high, with high level of local interest and understanding.

Dan Jepson noted that the *Environmental Methodology Report* section on cultural resources should be more detailed and reflect archaeological and paleontological investigations and Native American consultations, all of which will be conducted by CDOT. He also requested that given the size and complexity of historic resources in this study area the consultant team have very close contact with CDOT-EP, especially Dan and Lisa Schoch/CDOT EP. Dan offered that when CH2M HILL meets with local groups on historic resource issues, CDOT would be willing to attend. Bill Knapp noted that one of the public workshops is specifically focused on historical resources.

Steve Wallace/CDOT EP paleontologist, requested aerial photographs at 1" = 2000' scale for his fieldwork. He also noted that CDOT would need Rights of Entry agreements to do paleontology fieldwork.

Hazardous Materials

Debra Lebow/EPA, requested that the DEIS address the potential presence of lead-based paint, especially in residences and bridges. She also asked if we had methodology established on how to report and address methamphetamine labs (a growing concern in many urban areas).

One participant asked whether any of the alternatives would directly affect the mill, and whether a brownfields approach was appropriate. After discussion FHWA and CDOT agreed to confer with EPA on potential funding sources under their brownfields programs.

Alternatives Analysis

One participant asked if the EIS will revisit all of the original alternatives evaluated in the preliminary planning. CH2M HILL confirmed that these alternatives will be evaluated and documented.

Noise

CDOT recommended the *Environmental Methodology Report* to be revised to reflect the agency's new regulations on noise. Judy DeHaven/CDOT R2 will provide a copy of the guidance to CH2M HILL.

Erosion/Sedimentation especially in Fountain Creek

Anita Culp/Corps asked how sedimentation and erosion would be addressed in the EIS, and noted that stormwater and MS4 permits will be needed. She also noted that mitigation will be required, not “may” as currently stated in the *Environmental Methodology Report*.

John Liou/FEMA asked that the EIS address how to ensure protection of highway from flooding. The Corps asked that during design Dillon Crossing be made perpendicular to Fountain Creek, if possible, to minimize impacts.

Water Quality

One participant asked for identification of the City’s water sources. CH2M HILL explained that Pueblo obtains its water from the Arkansas River and Pueblo Reservoir.

Gordon McEvoy/CDOT EP suggested that the DEIS clarify the water use type that is impacted by project activities, and to distinguish between potable or industrial uses because water quality needs may vary among uses.

Wetlands and T & E

Allison Michael/USFWS asked that the DEIS include analysis include “water bodies, wildlife” for their important connections with riparian communities. She also noted that the agenda identified these resources, but the *Environmental Methodology Report* did not. CH2M HILL explained that wetlands and riparian habitat would be evaluated in the DEIS, as identified in the *Environmental Methodology Report*, and acknowledged that the agenda, which is based on the FHWA Technical Advisory does vary on that topic.

Anita Culp/Corps asked that care be taken in delineating wetlands in 2003, and to not base our analysis or conclusions on current hydrology. She suggested that during drought conditions we not rely only on hydrology but map the wetland features based on vegetation.

One commentor noted that Executive Order 11990 on Wetlands Protection should be identified as guidance in *Environmental Methodology Report*.

One commentor noted that the DEIS analysis of wetlands include discussion of the impacts on off-site gravel pits for aggregate, and suggested that this is a potentially important issue. The suggestion was made that we treat this potential impact as disclosure issue – that is, identify it in Indirect Effects or Cumulative Impacts, and don’t ignore it as a potential impact.

Another commentor noted that this same issue applied to floodplains – that is, gravel mining can indirectly affect floodplains.

Green Building Practices

Pat Martinik/CDPHE requested that green building practices be implemented wherever possible; for example, recycling old concrete and using recycled tires in noise walls. The commentor suggested that CDOT build these practices into contractual incentives for contractor. Bill Knapp suggested this be reflected in any project advertisements so contractors could reflect this approach in their bids. Another commentor suggested that

balancing recycling and other green practices be among the topics in the context sensitive solutions workshops.

Visual

One participant advised that FHWA and CDOT should use the federal Highway Beautification Act as guidance on visual impacts.

Cumulative Impacts

Chris Horn recommended the *Environmental Methodology Report* be revised to reflect the February 3, 2003, FHWA-published interim guidance on cumulative impacts. Chris Horn said he would provide this document to CDOT and CH2M HILL.

ARCHIVED MATERIALS

Contact list

Information Package

Environmental Methodology Report

Transcript of comments recorded on easel at meeting

11 x 17 maps

Invitation email

Invitation letter

B.Knapp PowerPoint presentation slides

Sign-In sheets



Agency Scoping Meeting

Please

Sign In

February 13, 2003

Name	Affiliation	Contact Information ONLY IF IT HAS CHANGED
Steve Wallace	CDOT Environmental	
MIKE BANOVICH	"	
GORDON McEvoy	" " Water Quality	GORDON.mcevoy@dot.state.co.us (303) 757-9343
Lisa Schoch	CDOT History	
Dan Jackson	CDOT AMENDED / Const. Res.	
Jerry Piffer	CDOT - Env. Programs	
Charmaine Farrar	FHWA	
Pat Martinek	CDPHE	
Alison Michael	USFWS	
Anita Culp	Corps of Engineers	
Dick ANNAND	CDOT - R2	
Mary Jo Vobjda	CH2M HILL	
Andres Garcia	CH2M HILL	
Judy Dettaven	CDOT R2	
David Miller	CDOT R2	
John Liou	FZMA. RS	



the New Pueblo Freeway

Agency Scoping Meeting

Please

Sign In

February 13, 2003

Name	Affiliation	Contact Information ONLY IF IT HAS CHANGED
Jim DiLeo	Dept of Health Air Pollution Control	
Dennis Durbin	FHWA	
Monica Pavlik	FHWA	(303) 964-6730 x 352 monicapavlik@fhwa.dot.gov
Chris Horn	FHWA	
Sarah Fowler	EPA - 404 Program	
DEBORAH LEBOW	EPA - NEPA	

The New Pueblo Freeway Draft EIS Agency Coordination Meeting

ATTENDEES: See full list on page 2

LOCATION: Interim Library Conference Room, 701 Court Street, Pueblo, Colorado

MEETING DATE: February 27, 2003

SUBJECT: New Pueblo Freeway

PROJECT: 158128; IM 0251-156; SA 12831

AUTHOR: Dirk D. Draper/CH2M HILL

INTRODUCTION

These meeting notes reflect the decisions and action items agreed on at this meeting. Please advise the Author as soon as possible if your meeting notes reflect any substantial differences from these notes.

On February 27, 2003, FHWA and CDOT hosted an Agency Coordination Meeting for the Draft Environmental Impact Statement (DEIS) of the New Pueblo Freeway. The meeting was held in the Interim Library for the City-County Library in Pueblo. The purpose of the meeting was to exchange information with resource management agencies about the project, and solicit feedback on the *Environmental Methodology Report* CH2M HILL has written for the project. The meeting began at 10 a.m. and lasted until 11:50 a.m.

INVITATION AND PARTICIPATION

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The project sponsors held an "Agency Scoping Meeting" in Lakewood on February 13, 2003. The email and letter invitations identified the February 13th meeting to all recipients for their convenience. Please refer to the separate Agency Scoping Meeting Summary from that event for more information.

PARTICIPANTS

Agency/Individual, Specialty	Invited	Attended
Federal and State Transportation Agencies		
FHWA/ Dennis Durbin, Environmental	Yes	Yes
CDOT Region 2/Dick Annand, RPEM	Yes	Yes
CDOT Region 2/Judy DeHaven, Environmental	Yes	Yes
CDOT Region 2/David Miller, Project Manager	Yes	Yes
Pueblo Resource Agencies		
Bessemer Historical Society/Maria Sanchez	Yes	No
City of Pueblo/Dan Centa, Transportation	Yes	Yes
City of Pueblo/David Cockrell, Neighborhoods	No	Yes
City of Pueblo/Tom Cvar, Public Works	Yes	No
City of Pueblo/Bob Gilliland, Parks	No	Yes
City of Pueblo/Jim Munch	Yes	Yes
City of Pueblo/Jack Quinn, Housing Authority	Yes	Yes
City of Pueblo/Rich Zajac, Parks	Yes	Yes
Colorado Division of Wildlife/Al Trujillo	Yes	No
Colorado Division of Wildlife/Kevin Kaczmarek	Yes	No
PACOG/Bill Moore, Director	Yes	Yes
Pueblo County/Kim Headley, Planning	Yes	No
Pueblo County/Greg Severance, Public Works	Yes	No
Pueblo County/Del Olivias, Social Services	Yes	No
Pueblo County/ Jeffrey Woeber, Planning	Yes	Yes
Pueblo County, City of Pueblo/Emmet Hance, Health Department	Yes	Yes
Pueblo County, City of Pueblo/Chris Nevin-Wood, Health Department	Yes	No
Pueblo County Historical Society/George Williams	Yes	Yes
U.S. Army Corps of Engineers/Van Truan, Manager	Yes	No
Consultant Team in Attendance		
CH2M HILL/Bill Knapp, EIS Project Manager		
CH2M HILL/ Andrea Garcia, EIS Task Manager		
CH2M HILL/Mary Jo Vobejda, EIS Public Involvement Manager		
CH2M HILL/Dirk Draper, Environmental Planner		
Ballantyne Marketing/Glenn Ballantyne, Public Involvement		

AGENDA

The agenda is attached and was followed in conducting the meeting.

DISPLAYS AND HANDOUTS

Bill Knapp/CH2M HILL Project Manager, conducted the majority of the first half of the meeting using a PowerPoint slide show and display maps that introduced participants to the project background and extensive development phase activities.

MaryJo Vobejda/CH2M HILL Public Involvement Task Manager, briefed the group on the public involvement strategies and activities that were conducted during the Feasibility Study. She highlighted the variety of methods used to engage the public in the decision making process that occurred during planning.

Bill Knapp provided an overview of the environmental issues that were discovered during the Feasibility Study and explained the reasons an EIS is warranted. Bill talked through the EIS schedule, which shows a DEIS submittal in December 2004.

Andrea Garcia/CH2M HILL EIS Task Manager, described FHWA and CDOT early agency coordination efforts. This included an October 7, 2002, field trip and informal resource

agency briefings conducted in November and December 2002. She described the purpose of the *Environmental Methodology Report* and how it will be used to guide the EIS study process. She said that comments are being accepted on the report through March 13, 2003.

A number of maps and oversized figures were displayed at the meeting, including aerial photos approximately 6 feet long overlain with map outlines of each build alternative.

Participants at the meeting were provided with a meeting agenda and three 11" x 17" maps of each of the alternatives, one overlaid on an aerial photograph. A number of copies of the *Environmental Methodology Report* were distributed at the meeting. Participants were asked to register on the Sign-In Sheet.

ACTION ITEMS

These action items were identified in the Agency Scoping meeting:

- CH2M HILL will send copies of the agenda, 11x17 maps, and minutes from both agency meetings to participants and invitees.
- Distribute Air Quality Technical Memo, when it is completed, to Pueblo County Health Department.
- Reach out to residents in the Prairie neighborhood, east of St. Mary's School, in discussions about potential impacts to and replacement of Benedict Park.
- Involve St. Charles Water District in the project if their points of diversion on the Arkansas River are to be affected.
- Agency representatives will submit comments on the *Environmental Methodology Report* to Andrea Garcia/CH2M HILL by March 13, 2003.
- After March 13, 2003, CH2M HILL will revise the *Environmental Methodology Report* to reflect comments from FHWA, CDOT, and participants at the Scoping and Coordination meetings. Copies of the revised *Environmental Methodology Reports* will be provided to agency representatives on the Scoping Contact List.

DISCUSSION

During the hour-long question-and-answer session CH2M HILL recorded comments and questions on a display easel. Much of the discussion focused on neighborhood impacts and local economic development.

Agency Coordination

Jim Munch/City asked how local agencies can best coordinate on the project with federal and state agencies. Bill Knapp reviewed opportunities for meetings that include context sensitive solution workshops, topic-specific open houses, monthly meetings with FHWA, and periodic meetings with the resource management agencies.

Bill Moore/PACOG asked how conflicts between agencies would be resolved. Denny Durbin/FHWA explained that FHWA will try to resolve issues whenever possible, but if that is not possible FHWA, as the lead agency, will make the final decision.

Emmet Hance/City-County Health Department said the County Health Department would be interested in coordinating with the Air Pollution Control Division (in Colorado Department of Health and Environment) and seeing the air quality deliverables when they are available. Andrea Garcia noted that APCD and EPA had attended the Agency Scoping meeting and that air toxins was subject of considerable discussion. She said that a more detailed air quality methodology report would be written before the air quality analysis is conducted. The report will be reviewed by air quality staff from FHWA, CDOT, APCD, EPA, and PACOG.

Jim Munch asked how the three community working groups would be involved in the EIS. Bill Knapp confirmed they would be involved, and that coordination efforts would begin following the scoping activities that are now underway.

Project Alternatives

Dan Centa/City asked why the south end of the project footprint had changed from the Feasibility Study, and whether that would affect the study. Bill Knapp responded that the EIS will evaluate all areas affected. He noted that the original study area ended at Pueblo Boulevard, as does the EIS, and that the Stem Beach interchange was added later to reflect a very long-term planning horizon. Bill also explained that the EIS study area ending at Pueblo Boulevard does not affect opportunities to improve the Stem Beach interchange at any time in the future.

Jim Munch asked whether the Dillon Street extension is included in the EIS boundaries, and whether the potential impact on Erie Avenue would be included in the EIS. Bill Knapp confirmed that the EIS includes the extension of Dillon Street but not the future/potential impacts associated with a connection to Erie.

George Williams/Pueblo Historical Society asked if a bypass entirely around the city had been suggested. David Miller/CDOT R2 and others explained that this had been explored and determined not to be desirable for the City to remove all traffic from the interstate.

Local Traffic

Dan Centa voiced concern about how the present configuration of access roads could shift traffic to Mesa from Northern, which is the opposite of what needs to happen. He suggested this intersection be examined to ensure it achieves the project's objectives, and that traffic calming and signage be used to reduce unwanted cut-through traffic. David Cockrell/City also noted that traffic speeds and volumes west of Mesa are a concern for schools in this area.

David Cockrell expressed support for a below-grade I-25 because it would reduce noise.

Bill Moore asked what decision was reached in building a slip ramp at Mesa/Northern. Bill Knapp explained that there was not sufficient room to construct the ramp under Mesa and the concept has been determined not to be feasible.

Dan Centa suggested that to improve local connectivity the project must include robust pedestrian and bicycle facilities. Jim Munch recommended that to improve connectivity the study must begin by identifying where the highway is a barrier and where it is not.

Project Phasing

Jim Munch asked if the project could be phased to implement some segments as partial funding becomes available. Bill Knapp and David Miller confirmed that no formal decision had been made and that this would be evaluated and implemented if appropriate. Judy DeHaven/CDOT R2 also noted that CDOT will talk with EPA about how brownfields approaches could be used in some areas of the corridor to limit remediation requirements and expedite highway improvements.

Community Parks

George Williams suggested that residents in the Prairie neighborhood, east of St. Mary's School, be included in discussions about potential impacts to Benedict Park, noting that this is one of few parks on the east side, and is heavily used by those residents. He also noted that the layout of the park be considered as well as the acreage of the park, and expressed concern that the long-thin footprint identified by Bill Knapp may not be usable as a park.

George Williams asked if indirect impacts (such as noise) on Mineral Palace Park will be evaluated and addressed, and how potential impacts will be balanced. He cited as an example how a noise wall could protect the quiet but block views into the park. Bill Knapp confirmed that indirect impacts will be addressed, and agreed that some balancing like this will be required, but it is too early to determine how an issue like this would be resolved.

Neighborhoods

David Cockrell requested that the new *Bessemer Neighborhood Plan* be considered in the EIS plan. David noted he is the City's representative working with the neighborhood. He also commented that in any redevelopment, parking at the site will be important, and that boundaries just south of the Bessemer Ditch and future access points are all being considered now.

Historic Properties

Jim Munch said that a new local historic preservation commission regulates demolition of historic properties. He noted potential impacts along Bradford and asked whether CDOT would comply with local regulations on demolition. Judy DeHaven asked if relocation was an appropriate option that would avoid demolition and preserve these properties. These issues will be addressed in the EIS.

David Cockrell observed that a local group, supported by students from the University of Colorado, is working on nominating Mineral Palace Park as a national historic district. Another commentor noted that creation of a Northside Historic District is being explored now.

Jim Munch asked if the EIS will consider induced economic impacts and development pressure near interchanges. He suggested that the secondary impacts analysis should evaluate the "big picture" such as the location of hazardous materials sites relative to the

interstate. Bill Knapp and others confirmed that we will evaluate secondary and indirect impacts in the EIS.

Environmental Justice

Andrea Garcia noted that the project sponsors were aware of potential impacts related to environmental justice. She asked Jack Quinn/City Housing Authority if he had suggestions of how to effectively engage low income and minority neighborhoods in the planning process. Jack Quinn responded that he understood that the seniors' high rise north of Mineral Palace Park would not be impacted under the present footprint.

Bill Knapp asked specifically for suggestions about how to engage the East Grove neighborhood in planning activities. Emmet Hance acknowledge this is difficult and recommended being tenacious in efforts to engage neighborhoods. Jack Quinn noted that the Grove neighborhood has many rentals and thus residents are unlikely to participate.

Water Resources

Jim Munch recommended that St. Charles Water District be involved in the project if their points of diversion are to be affected. He also noted that the Bureau of Reclamation may undertake a NEPA study on reauthorizing the dam and minimum flow requirements associated with a pipeline project to Colorado Springs, and recommended the project team coordinate with the Bureau's effort.

George Williams observed that public works has some emergency floodgates that may be affected, and asked if they were involved. Andrea Garcia noted that Public Works was invited to today's meeting, that we would coordinate with them, and that they would be provided with meeting minutes.

ARCHIVE MATERIALS

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Information Package

Environmental Methodology Report

Transcript of comments recorded on easel at meeting

11 x 17 maps

Invitation email

Invitation letter

B.Knapp PowerPoint presentation slides

Sign-In sheets



Agency Coordination Meeting

Please

Sign In

February 27, 2003

Name	Affiliation	Contact Information ONLY IF IT HAS CHANGED
Bill Knapp	CH2M Hill	
Andrew Garcia	CH2M Hill	
Diana Draper	CH2M HILL	
David Miller	CDOT	
Dennis Durbin	FHWA	
George Williams	P.C.H.S	
Ernie Hance	Pueblo City Co Health Dept.	
Jeffrey Woeber	Pueblo County Planning & Dev.	
Dan Center	City	
Mary Jo Vobejda	CH2M HILL	
Rick ANNAND	CDOT-R2	
Bill Moore	ADMINISTRATOR, PUEBLO MPO	
Judy DeHaven	CDOT-R2	
Pat Quinn	Pueblo Housing Auth	1414 N. SANTA Fe PUEBLO, CO 81003
David Cockrell	City Neighborhood Planning	
Tim Monch	City of Pueblo	

Section 6(f) Correspondence



Colorado State Parks

State Trails Program - Southern Colorado Trails Coordinator

4255 Sinton Road • Colorado Springs, Colorado 80907 • Phone (719) 227-5259 • FAX (719) 227-5264 • www.parks.state.co.us

February 16, 2005

Richard Annand
Region Planning & Environmental Manager
Colorado Department of Transportation
P.O. Box 536 – 905 Erie Avenue
Pueblo, CO 81002

Re: LWCF funded improvements along I-25 in Pueblo

Dear Mr. Annand:

On January 28th you and I met with Andrea Garcia and Scott Asher of CH2MHill, and Steven Meier of the City of Pueblo at the location of the US Highway 50 and Fountain Creek Trail crossing in Pueblo, Colorado. I appreciate you and your staff taking the time to show me the proposed I-25 expansion project and how it might affect the Fountain Creek Trail and other projects funded by Land and Water Conservation Fund and other funding sources we have managed grants on.

From walking the site with CDOT and CH2MHill representatives I feel that there is little chance that the I-25 Expansion Project, which includes improvements to US Highway 50 at this location where it joins I-25, will negatively impact the Fountain Creek Trail. By constructing one or more retaining walls where the trail crosses under Highway 50 and goes down beside Fountain Creek, you will keep the toe of the slope of the highway from encroaching on the trail surface. It appears to me that the surface of the trail, the footbridge over the small stream beside the highway, and a small three-foot right of way along the trail for signs, etc., are all the improvements that have been funded by our grant where the trail crosses the CDOT right of way.

In fact, I think the new construction will present an exciting opportunity to actually improve the setting and features surrounding the trail where it crosses under the highway. Hopefully, the retaining wall(s) installed by CDOT will be decorative in nature reflecting the park-like setting the City of Pueblo has planned for that location.

Additionally, there are two shortcomings with the trail as it exists today. First, it is so low next to Fountain Creek as it crosses under the existing Highway 50 bridge that it periodically floods. Second, where the trail intersects the footbridge just on the south side of Highway 50, there is a hard 90-degree bend, which creates a dangerous blind corner for trail users. If construction

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Colorado Board of Parks and Outdoor Recreation: • Dr. Tom Ready, Chair, Natural Areas Representative • Doug Cole, GOCO Representative
Wade Haerle, Member • Tom Glass, Member • Antonette DeLauro, Member



Colorado State Parks

State Trails Program - Southern Colorado Trails Coordinator

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crews do find it necessary to go on to the trail for reconstruction of the highway, I would ask that they fix these two areas by raising the trail bed by two feet where it goes under the highway bridge and by straightening that portion of the trail where it meets the footbridge. This would allow trail users to more safely use the trail, even when the creek is high.

It is my understanding from talking to you and CH2MHill that the remaining two LWCF funded projects near the I-25 expansion will not be affected. Either of the proposed new bridge crossings near Runyon Park and Runyon Field will not impact this park at all, and will miss them altogether.

Again, I appreciate your assistance in showing me this proposed project. If you need me for any related information that I may be able to provide, feel free to call me. Best of luck on this project.

Sincerely,

Casey Swanson

Cc: ✓ Scott Asher
Steven Meier
Lori Malcolm

STATE OF COLORADO • COLORADO STATE PARKS

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Section 106 Consultation

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



September 7, 2004

David Cockrell
Pueblo Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 E. D Street
Pueblo, CO 81003

SUBJECT: APE and Survey Methodology for Historic Resources, CDOT Project IM 0251-156, I-25:
The New Pueblo Freeway Environmental Impact Statement

Dear Mr. Cockrell:

This letter and the attached materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for your review of and comment on the Area of Potential Effect (APE) and proposed survey methodology for the Environmental Impact Statement (EIS) for the project referenced above. The purpose of the EIS is to determine potential environmental impacts for proposed capacity improvements along eight miles of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Components of the two build alternatives include:

- Widening I-25 to six lanes,
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- Adding a new interchange at Northern Avenue
- Removing interchanges at Illinois Avenue, Central Avenue, Ilex Street, and 6th Street

Establishing the APE

A number of meetings to define the APE for this project have been held with representatives from FHWA, CDOT, the State Historic Preservation Officer (SHPO), the Bessemer Historical Society, and the City of Pueblo. An initial meeting with Dan Corson, Jim Green and Joseph Saldibar of the SHPO office was held in November 2002 to introduce the project. In July 2003, representatives of CDOT and consultant CH2M Hill again met with staff from the SHPO including Joe Saldibar, to discuss the proposed APE. In September 2003 several meetings to solicit local input were held with various Pueblo representatives, including:

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- Corinne Koehler, President, Bessemer Historical Society
- Jim Munch, City Planner, City of Pueblo

- Kerrelyn Trent, Historic Preservation Commission, City of Pueblo
- Jordan Glynis, City of Pueblo

A final meeting was held on December 22, 2003 with representatives from the City of Pueblo, your organization, and the Bessemer Historical Society to gather additional comments on the proposed APE. Based on the results of this meeting, adjustments to the APE were made and the changes were applied to the map enclosed with this submittal.

The following objectives were considered when defining the APE:

1. According to the Section 106 guidelines, the APE must include any direct or indirect impacts that may be caused by the undertaking. In addition to determining impacts to any properties within the defined APE, indirect visual or auditory impacts will be analyzed for all NRHP eligible or listed properties within the APE.
2. The proposed APE allows for all project-related actions, such as interchange reconstruction, frontage road relocation, or alignment shifts.
3. The APE must be supported by sufficient documentation to enable reviewing parties to understand its basis.

The following description of the proposed APE for the I-25/New Pueblo Freeway corresponds with the boundary illustrated on the enclosed map:

1. Pueblo Boulevard interchange north to the Rocky Mountain Steel Mill: The APE encompasses areas that would be directly impacted by the two build alternatives, including a commercial area southeast of the interchange that will be acquired and removed to accommodate a loop ramp. Immediately south of the mill near Nevada Avenue, the APE extends 830 feet east-to-west across I-25. This section of the APE includes two blocks of residences in close proximity to I-25 that may be impacted by the improvements.
2. South edge of the Steel Mill to Northern Avenue: The APE averages approximately 700 feet east-to-west and includes the first row of Steel Mill buildings, including blast furnace foundations and private rail lines on the mill property. West of I-25, the boundary includes two blocks of residences and light industrial areas in the Minnequa neighborhood.
3. Northern Avenue to 1st Street: In this area, the APE encompasses commercial, industrial and residential areas extending to a maximum 3150 feet east-to-west near Summit Avenue, before decreasing to 160 feet, or roughly the size of the footprint for the existing highway alignment. East of I-25 between Northern and Summit, the boundaries include two blocks outside areas directly affected by the two build alternatives.
4. 1st Street north to 15th Street: The APE east of the interstate begins to narrow as both build alternatives closely follow the existing alignment of I-25, and adding highway capacity is accomplished with less disturbance. In the middle of this section, near W. 8th Street, the APE measures 1,200 feet east-to-west. An additional area is present which measures 700 feet east over Fountain Creek along the footprint of W. 8th Street. The east side of Santa Fe Avenue, and buildings that back up to improvements to remove horizontal curvature in the mainline of the highway, are also included in this section of the APE.

4. 15th Street north to 29th Street: The east boundary of the APE remains west of Fountain Creek except to reflect improvements to the bridge on US Highway 50B and the proposed extension of Dillon Drive south to US 50B. Along both W. 17th Street and above W. 26th Street the APE extends to a maximum 1,700 feet east-to-west. The area from W. 15 to W. 19th Streets includes Mineral Palace Park and 500 ft for the first row of residences that back up to the interstate. All of Mineral Palace Park is included in the APE, reflecting the historic nature of the park and features therein.

Methodology

FHWA and CDOT propose the following methodology to assess features in all areas of the APE, except the Rocky Mountain Steel Mill:

1. The survey will evaluate all buildings and features 45 years old or older within the APE that have not been previously documented.
2. All properties that have been previously recorded on Colorado Office of Archaeology and Historic Preservation (OAHP) site forms will be reevaluated and site forms will be submitted with updated recommendations on eligibility.
3. Photographs of all resources (isolates, sites and structures) in the APE will be provided to the State Historic Preservation Office (SHPO) as part of the survey. The locations of these resources will be marked on an accompanying site map or topographic map and documented on the appropriate OAHP site forms. Potential historic districts will be identified and discussed in the survey report, including a list of all buildings in the APE and potential district(s), with contributing and non-contributing status, construction date, architectural style, and address. A map will be provided that shows the locations of all contributing buildings within the APE and potential district(s).

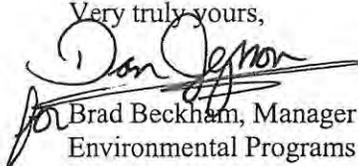
The nature and scope of survey for the Rocky Mountain Steel Mill site remains to be determined, as this is dependent on the wishes and cooperation of the owners. The scheduled work will be sufficient to assess features within the APE as they relate to the overall plant site.

Historic archaeological resources will be inventoried and evaluated within the APE; the potential for prehistoric resources will be evaluated, and selected areas will be intensively inventoried. The areas to be surveyed will be based on the amount of surface disturbance and extant buildings.

We request your comments regarding the Area of Potential Effect and the proposed methodology for the historic survey. We have also sent this letter and the enclosed map to the SHPO, the City of Pueblo, and the Bessemer Historical Society for comment.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures: map

cc: David Miller, CDOT Region 2 Engineering, Project Manager
Dick Annand/Judy DeHaven, CDOT Region 2 Environmental Office
Andrea Garcia, CH2M Hill Senior Transportation Planner
Chris Horn/Monica Pavlik, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



September 7, 2004

Ms. Georgianna Contiguglia
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: APE and Survey Methodology for Historic Resources, CDOT Project IM 0251-156, I-25:
The New Pueblo Freeway Environmental Impact Statement

Dear Ms. Contiguglia:

This letter and the attached materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for your review of and comment on the Area of Potential Effect (APE) and proposed survey methodology for the Environmental Impact Statement (EIS) for the project referenced above. The purpose of the EIS is to determine potential environmental impacts for proposed capacity improvements along eight miles of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Components of the two build alternatives include:

- Widening I-25 to six lanes,
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Establishing the APE

A number of meetings to define the APE for this project have been held with representatives from FHWA, CDOT, your office, the Pueblo Historic Preservation Commission, the Bessemer Historical Society, and the City of Pueblo. An initial meeting with Dan Corson, Jim Green and Joseph Saldibar of your office was held in November 2002 to introduce the project. In July 2003, representatives of CDOT and consultant CH2M Hill again met with staff from your office, including Mr. Saldibar, to discuss the proposed APE. In September 2003 several meetings to solicit local input were held with various Pueblo representatives, including:

- Donna Alber, Historic Preservation Commission, City of Pueblo
- David Cockrell, Historic Preservation Commission, Neighborhood Planning, City of Pueblo
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- Corinne Koehler, President, Bessemer Historical Society
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- Jordan Glynis, City of Pueblo

A final meeting was held on December 22, 2003 with representatives from the City of Pueblo, the Pueblo Historic Preservation Commission, and the Bessemer Historical Society to gather additional comments on the proposed APE. Based on the results of this meeting, adjustments to the APE were made and the changes were applied to the map enclosed with this submittal.

The following objectives were considered when defining the APE:

1. According to the Section 106 guidelines, the APE must include any direct or indirect impacts that may be caused by the undertaking. In addition to determining impacts to any properties within the defined APE, indirect visual or auditory impacts will be analyzed for all NRHP eligible or listed properties within the APE.
2. The proposed APE allows for all project-related actions, such as interchange reconstruction, frontage road relocation, or alignment shifts.
3. The APE must be supported by sufficient documentation to enable reviewing parties to understand its basis.

The following description of the proposed APE for the I-25/New Pueblo Freeway corresponds with the boundary illustrated on the enclosed map:

1. Pueblo Boulevard interchange north to the Rocky Mountain Steel Mill: The APE encompasses areas that would be directly impacted by the two build alternatives, including a commercial area southeast of the interchange that will be acquired and removed to accommodate a loop ramp. Immediately south of the mill near Nevada Avenue, the APE extends 830 feet east-to-west across I-25. This section of the APE includes two blocks of residences in close proximity to I-25 that may be impacted by the improvements.
2. South edge of the Steel Mill to Northern Avenue: The APE averages approximately 700 feet east-to-west and includes the first row of Steel Mill buildings, including blast furnace foundations and private rail lines on the mill property. West of I-25, the boundary includes two blocks of residences and light industrial areas in the Minnequa neighborhood.
3. Northern Avenue to 1st Street: In this area, the APE encompasses commercial, industrial and residential areas extending to a maximum 3150 feet east-to-west near Summit Avenue, before decreasing to 160 feet, or roughly the size of the footprint for the existing highway alignment. East of I-25 between Northern and Summit, the boundaries include two blocks outside areas directly affected by the two build alternatives.
4. 1st Street north to 15th Street: The APE east of the interstate begins to narrow as both build alternatives closely follow the existing alignment of I-25, and adding highway capacity is accomplished with less disturbance. In the middle of this section, near W. 8th Street, the APE measures 1,200 feet east-to-west. An additional area is present which measures 700 feet east over Fountain Creek along the footprint of W. 8th Street. The east side of Santa Fe Avenue, and buildings that back up to improvements to remove horizontal curvature in the mainline of the highway, are also included in this section of the APE.

4. 15th Street north to 29th Street: The east boundary of the APE remains west of Fountain Creek except to reflect improvements to the bridge on US Highway 50B and the proposed extension of Dillon Drive south to US 50B. Along both W. 17th Street and above W. 26th Street the APE extends to a maximum 1,700 feet east-to-west. The area from W. 15 to W. 19th Streets includes Mineral Palace Park and 500 ft for the first row of residences that back up to the interstate. All of Mineral Palace Park is included in the APE, reflecting the historic nature of the park and features therein.

Methodology

FHWA and CDOT propose the following methodology to assess features in all areas of the APE, except the Rocky Mountain Steel Mill:

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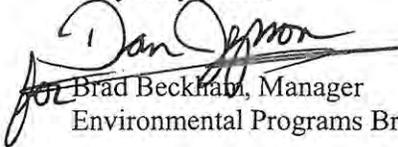
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We request your comments regarding the Area of Potential Effect and the proposed methodology for the historic survey. We have also sent this letter and the enclosed map to the City of Pueblo Planning Department, the Bessemer Historical Society, and the Pueblo Historic Preservation Commission for comment.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


Brad Beckham, Manager
Environmental Programs Branch

Enclosures: map

cc: David Miller, CDOT Region 2 Engineering, Project Manager
Dick Annand/Judy DeHaven, CDOT Region 2 Environmental Office
Andrea Garcia, CH2M Hill Senior Transportation Planner
Chris Horn/Monica Pavlik, FHWA
George Williams, Pueblo Historical Society

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



September 7, 2004

Corinne Koehler
Bessemer Historical Society
1612 E. Abriendo Avenue
Pueblo, CO 81004

SUBJECT: APE and Survey Methodology for Historic Resources, CDOT Project IM 0251-156, I-25:
The New Pueblo Freeway Environmental Impact Statement

Dear Ms. Koehler:

This letter and the attached materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for your review of and comment on the Area of Potential Effect (APE) and proposed survey methodology for the Environmental Impact Statement (EIS) for the project referenced above. The purpose of the EIS is to determine potential environmental impacts for proposed capacity improvements along eight miles of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

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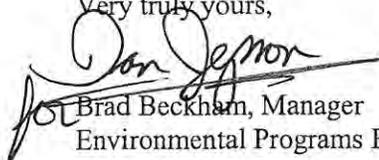
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F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



September 10, 2004

Mr. George Williams
Pueblo County Historical Society
Vail Hotel
217 S. Grand Avenue
Pueblo, CO 81003

SUBJECT: APE and Survey Methodology for Historic Resources, CDOT Project IM 0251-156, I-25:
The New Pueblo Freeway Environmental Impact Statement

Dear Mr. Williams:

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2. South edge of the Steel Mill to Northern Avenue: The APE averages approximately 700 feet east-to-west and includes the first row of Steel Mill buildings, including blast furnace foundations and private rail lines on the mill property. West of I-25, the boundary includes two blocks of residences and light industrial areas in the Minnequa neighborhood.
3. Northern Avenue to 1st Street: In this area, the APE encompasses commercial, industrial and residential areas extending to a maximum 3150 feet east-to-west near Summit Avenue, before decreasing to 160 feet, or roughly the size of the footprint for the existing highway alignment. East of I-25 between Northern and Summit, the boundaries include two blocks outside areas directly affected by the two build alternatives.
4. 1st Street north to 15th Street: The APE east of the interstate begins to narrow as both build alternatives closely follow the existing alignment of I-25, and adding highway capacity is accomplished with less disturbance. In the middle of this section, near W. 8th Street, the APE measures 1,200 feet east-to-west. An additional area is present which measures 700 feet east over Fountain Creek along the footprint of W. 8th Street. The east side of Santa Fe Avenue, and buildings that back up to improvements to remove horizontal curvature in the mainline of the highway, are also included in this section of the APE.

4. 15th Street north to 29th Street: The east boundary of the APE remains west of Fountain Creek except to reflect improvements to the bridge on US Highway 50B and the proposed extension of Dillon Drive south to US 50B. Along both W. 17th Street and above W. 26th Street the APE extends to a maximum 1,700 feet east-to-west. The area from W. 15 to W. 19th Streets includes Mineral Palace Park and 500 ft for the first row of residences that back up to the interstate. All of Mineral Palace Park is included in the APE, reflecting the historic nature of the park and features therein.

Methodology

FHWA and CDOT propose the following methodology to assess features in all areas of the APE, except the Rocky Mountain Steel Mill:

1. The survey will evaluate all buildings and features 45 years old or older within the APE that have not been previously documented.
2. All properties that have been previously recorded on Colorado Office of Archaeology and Historic Preservation (OAHP) site forms will be reevaluated and site forms will be submitted with updated recommendations on eligibility.
3. Photographs of all resources (isolates, sites and structures) in the APE will be provided to the State Historic Preservation Office (SHPO) as part of the survey. The locations of these resources will be marked on an accompanying site map or topographic map and documented on the appropriate OAHP site forms. Potential historic districts will be identified and discussed in the survey report, including a list of all buildings in the APE and potential district(s), with contributing and non-contributing status, construction date, architectural style, and address. A map will be provided that shows the locations of all contributing buildings within the APE and potential district(s).

The nature and scope of survey for the Rocky Mountain Steel Mill site remains to be determined, as this is dependent on the wishes and cooperation of the owners. The scheduled work will be sufficient to assess features within the APE as they relate to the overall plant site.

Historic archaeological resources will be inventoried and evaluated within the APE; the potential for prehistoric resources will be evaluated, and selected areas will be intensively inventoried. The areas to be surveyed will be based on the amount of surface disturbance and extant buildings.

We request your comments regarding the Area of Potential Effect and the proposed methodology for the historic survey. We have also sent this letter and the enclosed map to the SHPO, City of Pueblo Planning Department, the Bessemer Historical Society, and the Pueblo Historic Preservation Commission for comment.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures: map

cc: David Miller, CDOT Region 2 Engineering, Project Manager
Dick Annand/Judy DeHaven, CDOT Region 2 Environmental Office
Andrea Garcia, CH2M Hill Senior Transportation Planner
Chris Horn/Monica Pavlik, FHWA



COLORADO
HISTORICAL
SOCIETY

The Colorado History Museum 1300 Broadway Denver, Colorado 80203-2137

September 13, 2004

Brad Beckham
Manager, Environmental Programs Branch
Colorado Department of Transportation
Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: CDOT Project IM 0251-156, I-25: The New Pueblo Freeway Environmental Impact Statement (CHS #43967)

Thank you for your correspondence dated September 7, 2004 and received by our office on September 9, 2004 regarding the above-mentioned project.

After review of the submitted information, we are not able to complete our review of your boundary for the proposed Area of Potential Effect (APE). In order to complete our review, please provide an explanation of how the APE boundary incorporates potential indirect effects.

In the case of the Rocky Mountain Steel Mill, the lead agency must make a reasonable and good faith effort to carry out appropriate identification efforts, as stipulated in 36 CFR 800.4. If the lead agency can not gain access to the property for the purposes of conducting a survey, the lead agency should consult with the SHPO and consulting parties regarding the eligibility of the Rocky Mountain Steel Mill. (As a note, resource 5PE.543.1/CF&I Corporation Headquarters-Medical Building and resource 5PE.543.2/CF&I Corporate Headquarter-Offices have been previously identified.)

If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Coordinator, at (303) 866-4678.

Sincerely,

Mark [Signature]
For Georgianna Contiguglia
State Historic Preservation Officer

cc: [Lisa Schoch/CDOT](#)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



April 25, 2006

Catherine Barrier
CH2M Hill
1515 Poydras Street
Suite 2110
New Orleans, LA 70112

Subject: New Pueblo Freeway Cultural Resources Files

Dear Catherine:

Enclosed are a total of 7 CDs with the New Pueblo Freeway files for your review. Six of the CDs include the Microsoft Word files (e.g., survey report, site forms, district forms) for the initial review we completed last October 2005. All of these files include CDOT's revisions in "track changes," but for several of the districts, the comments were just highlighted in red. These CDs include the following items:

- CD 1: Survey report with CDOT comments in "track changes", and CDOT's first review comments broken down by neighborhood and non-district. This CD also includes a file of the historic archaeological forms. The files are divided by district name, and I double-checked and it looks like most of these were dumped into the overall district files, but I don't believe the non-district HA files are in the larger non-district file (if that makes sense!) Also, please take a look at the file of "tested sites"—I'm not sure these were placed in the larger district files.
- CD 2: Site forms for the Grove neighborhood—includes both the architectural site forms and the historic archaeology (HA) files, which are in a separate folder within the larger Grove folder.
- CD 3: Site forms for Bessemer and Blocks neighborhoods—includes architectural and HA site forms. HA is embedded in each neighborhood. For the Blocks, the HA starts with site number 5PE 5452. For Bessemer, the HA forms start with 5PE5466.
- CD 4: Includes management date forms for each of the proposed districts and re-evaluation forms for previously documented properties. Note that this CD contains some extra files that were included in the original CDs produced by WCRM. I think some of the additional files were drafts that WCRM forgot to remove from the final CDs.
- CD 5: Site forms for East Mesa Neighborhood, including architectural and HA. HA is in a separate file marked "EastMesaHA" within the larger file. There is also an additional file that I believe includes some architectural forms. This CD also includes the properties that were not part of any of the proposed districts (Non-District)—I think there is a mix of architectural and HA for the non district properties.
- CD 6: Site forms for Goat Hill, Lake Minnequa, and Mineral Palace Park neighborhoods, including architectural and HA. The HA for Goat Hill is in a separate folder. The HA for Lake Minnequa and Mineral Palace Park are not separated from the main file, but can be

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
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Denver, Colorado 80222
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July 26, 2007

Ms. Georgianna Contiguglia
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Eligibility Determinations, CDOT Project IM 0251-156, I-25 New Pueblo Freeway
Environmental Impact Statement

Dear Ms. Contiguglia:

This letter and the enclosed materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for concurrence on historic property eligibility determinations for the Environmental Impact Statement (EIS) referenced above. The purpose of the EIS is to analyze potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). We previously consulted with your office regarding the Area of Potential Effects (APE) and survey methodology for this undertaking in a series of meetings in 2002 and 2003, and via correspondence in September 2004. Please note that a report and site forms for historic archaeological resources will be forwarded for your review separately in the near future.

Eligibility Determinations

The survey report and site forms were completed by Western Cultural Resource Management (WCRM) and CH2M Hill under contract to CDOT. The survey resulted in the identification of three proposed historic districts (Mineral Palace Park, Goat Hill, Bessmer/Lake Minnequa) and 852 individual architectural resources that are not within historic districts (non-district). Of the non-district properties, we have evaluated fifteen as eligible for the National Register of Historic Places: 5PE584, 5PE588, 5PE3938, 5PE4504, 5PE4505, 5PE4510, 5PE4532, 5PE4536, 5PE4539, 5PE4540, 5PE4629, 5PE4971, 5PE4972, 5PE5080, and 5PE5088. The survey also included the reconnaissance-level evaluation of the Minnequa Works, formerly known as the Colorado Fuel & Iron steel mill.

For your convenience, the site forms for all properties comprising this submittal are organized in accordion file folders labeled according to district or non-district status. Also included herewith is a comment matrix on compact disk for use during the review. In addition, five aerial maps are enclosed for your review: three showing the project alternatives and two that depict the boundaries of the potential historic districts and previously identified historic districts.

We request your concurrence with the determinations of eligibility outlined in the survey report, enclosed forms and attached spreadsheet. Your response is necessary for the Federal Highway Administration's compliance with Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's regulations.

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
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(303) 757-9259



July 27, 2007

Mr. Wade Broadhead
Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 East D. Street
Pueblo, CO 81003

SUBJECT: Eligibility Determinations, CDOT Project IM 0251-156, I-25 New Pueblo Freeway
Environmental Impact Statement

Dear Mr. Broadhead:

This letter and the enclosed materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for comments on historic property eligibility determinations for the Environmental Impact Statement (EIS) referenced above. You recently received the survey report, site forms, and a comment matrix from our consultant CH2M Hill. The purpose of the EIS is to analyze potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). We previously consulted with your organization regarding the Area of Potential Effects (APE) and survey methodology for this undertaking in a series of meetings in 2002 and 2003. Please note that a report and site forms for historic archaeological resources will be forwarded for your review separately in the near future.

Eligibility Determinations

The survey report and site forms were completed by Western Cultural Resource Management (WCRM) and CH2M Hill under contract to CDOT. The survey resulted in the identification of three proposed historic districts (Mineral Palace Park, Goat Hill, Bessmer/Lake Minnequa) and 852 individual architectural resources that are not within historic districts (non-district). Of the non-district properties, we have evaluated fifteen as eligible for the National Register of Historic Places: SPE584, SPE588, SPE3938, SPE4504, SPE4505, SPE4510, SPE4532, SPE4536, SPE4539, SPE4540, SPE4629, SPE4971, SPE4972, SPE5080, and SPE5088. The survey also included the reconnaissance-level evaluation of the Minnequa Works, formerly known as the Colorado Fuel & Iron steel mill.

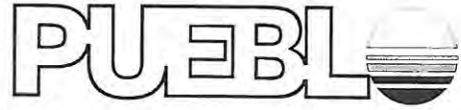
Enclosed with this letter are two aerial maps for your review: one that depicts the boundaries of the potential historic districts identified for this project, and one that indicates locations of historic districts identified in 1981. Per our telephone discussion on July 27, 2007, we will be sending copies of maps depicting the project alternatives in a separate submittal.

As a local preservation organization with a potential interest in these historic resources, we welcome your comments regarding our determinations of eligibility. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient for your staff and the additional consulting

Historic Preservation Commission

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Susan Pelto, Chair
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Kerrellyn Trent
Gary L. Trujillo



August 8, 2007

Mr. Brad Beckham
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Avenue
Shumate Building
Denver, CO 80222

Dear Mr. Beckham:

We have received all the materials for the New Pueblo Freeway Section 106 Review in consultation with your office. We are pleased to have this opportunity to provide feedback on the history of Pueblo, and the Pueblo Historic Preservation Commission takes this responsibility seriously.

I have been in contact with the other interested parties such as Bessemer Historical Society, Historic Preservation, Inc., and the Pueblo County Historical Society and am trying to coordinate the review between these organizations. We have devised a system to review the report and all the associated site forms, and are beginning work in earnest this week. Since this is one of the largest projects of its kind in Colorado, and our Commission primarily operates on volunteer hours, we will need to request an additional forty-five (45) days for review. We have conducted three meetings to organize the review in addition to a form-by-form inventory to verify that we possess all the forms that were on your attached spreadsheet. All the hard copy forms are accounted for, but we are missing a little over 100 sites electronically. Since we have yet to receive the archaeological site forms, we may have to request additional time to finish the review of those resources.

I will stay in contact during the process and keep you updated on our progress.

Sincerely,


Wade Broadhead
Land Use Planner
Historic Preservation Commission

WB/ktm

Historic Preservation Commission

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<http://pueblo.us/historicpreservation>

Susan Pelto, Chair
Donna Alber
Deborah Espinosa
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Gary L. Trujillo



August 29, 2007

Mr. Brad Beckham
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Ave.
Shumate Building
Denver, CO 80222

Dear Mr. Beckham:

We have now been reviewing the Section 106 materials for one month. After I presented an update on the progress of the review at our August 23, 2007 meeting, the Pueblo Historic Preservation Commission voted to request an extension of the Section 106 review time. Due to the massive amounts of information and forms, we respectfully request an additional **two weeks** to finalize our review and draft a thorough letter of response. The reasons for our request are described below.

First, now that a number of Commissioners and volunteers have viewed the materials, it is becoming clear that the historical background on the site forms, and some of the historic context sections, are woefully inadequate to determine if a property is significant or not. Also, the many uncorrected typographical errors also indicate that these forms may not be "finished". In this light we have to try and do your consultants' homework for them. To that end, we are organizing sessions with residents and local history experts in the neighborhoods to try and determine the major events and personalities that shaped these unique places. We fear that our comments may be dismissed so we are actively trying to put together strong historical backgrounds for subject properties and neighborhoods for future meetings regarding eligibility. Although your consultants rightfully identified "Pueblo's Ethnic Heritage and Influences of Ethnic Groups on Pueblo's Past", your consultants did not seem to make the link with those structures and businesses that embody and characterize a distinctive ethnic group in a particular neighborhood.

Second, the initial proposed review period was slated for March 2007. Our Commission had special meetings and spent a lot of time and resources gearing up for the planned review. Now that it has arrived five months later than anticipated we are not as prepared to review the materials as we were in March. Meanwhile, we are reviewing our first residential Historic District Nomination in thirty (30) years and this project requires an enormous amount of Staffs' time. While the SHPO can simply devote more resources to their review to finish in the allotted time, we must rely on the kindness and sacrifice of volunteers and some City Staff, who are tasked to accomplish a number of other goals besides Section 106 Review.

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We acknowledge the massive scope of the project and the difficulty in conducting and organizing such a broad review. However, since the project is being paid for with tax dollars, and the City will eventually be using the data for a number of preservation projects, we would like to hold the standard of work to the highest level. Also, we do not wish to see some of our important historical sites destroyed or discarded in the future because we had limited time to adequately review the site forms.

Sincerely,



Wade Broadhead
Land Use Planner
Historic Preservation Commission



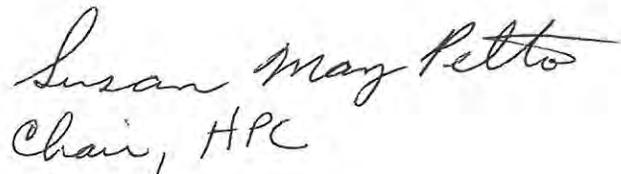
Deborah Espinosa, HPC Commissioner



Mark Mellich, HPC Commissioner



Kerrelyn Trent, HPC Commissioner



Chair, HPC

F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
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September 10, 2007

Mr. Wade Broadhead
Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 East D. Street
Pueblo, CO 81003

SUBJECT: Section 106 Review Extension, CDOT Project IM 0251-156, I-25 New Pueblo Freeway
Environmental Impact Statement

Dear Mr. Broadhead:

Thank you for your letter of August 29, 2007. We appreciate your efforts to review the New Pueblo Freeway Section 106 materials, and are sensitive to your staffing issues and other time commitments. Given these factors, we agree to extend your review time frame an additional two weeks beyond the original date of September 28th, and will look forward to your response on or before October 12, 2007.

We would also like to respond to your comments regarding information gaps on the site forms and historical context of the survey report. It is not our expectation that you will conduct additional research as part of your review. We have requested your comments on the National Register eligibility determinations we submitted; if you do not believe there is adequate documentation, please clarify this and outline your additional information needs in your response.

If you have questions, please contact CDOT Senior Staff Historian Lisa Schoch at 303-512-4258 or via email at lisa.schoch@dot.state.co.us.

Very truly yours,

for Brad Beckham, Manager
Environmental Programs Branch

cc: Dick Annand/Judy DeHaven, CDOT Region 2 Environmental Office
Chris Horn/Monica Pavlik, FHWA
Andrea Garcia, CH2M Hill Senior Transportation Planner
C/F



October 11, 2007

Brad Beckham
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: CDOT Project IM 0251-156; I-25 Pueblo Freeway Environmental Impact Statement; Determinations of Eligibility. (CHS #44746)

Dear Mr. Beckham,

Thank you for your correspondence dated July 26, 2007 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided additional information, we were able to concur with the finding of eligibility for the resources listed in the attached spreadsheet (see attached CD-ROM). Please refer to the column referenced as "SHPO Comments."

For the remaining surveyed properties, staff was unable to concur on the proposed findings of eligibility. Please see our general comments below.

- It was difficult to get a feel for the neighborhood surveys. The site forms were submitted as either being a part of a historic district or as individual properties located outside proposed historic districts. Neighborhoods were not submitted as a whole and it was difficult to determine the contributing and non-contributing properties to a possible neighborhood historic district.
- The historic or original boundaries of the surveyed neighborhoods are not clear. These boundaries are needed in order to evaluate whether or not the properties identified as being not individually eligible have the potential to be contributing to a neighborhood historic district. Also, it is hard to evaluate the proposed historic boundaries for the historic districts when the larger neighborhood boundaries are not clear.
- A majority of the forms feature Statements of Significance (item 42) that are actually discussions of integrity. Often item 39/Area(s) of Significance is left blank; however, the context study identified several areas of significance for the study area.
- On many of the forms, the Construction History (item 29) states additions to the original house, but the addition is not seen in the photos.
- On many of the forms, the Construction History (item 29) doesn't match what is stated in item 42. At times item 29 will state there are no changes, and item 42 will state a property is not eligible due to significant changes.
- Many of the forms state that a property is not eligible due to the application of stucco to the exterior. Stucco is a historic building material and, if added during the period of significance for the building or district, it can contribute to the eligibility of the property. There is no discussion of the historic use of stucco in Pueblo in the historic context report or on the site forms.

- Site forms for commercial or community landmark buildings, such as schools or churches, do not address the significance of these resources. Often the site form is marked as the property not having any significant historical associations; however, the context study discusses the importance of local corner or neighborhood stores. The Star Nursery (5PE.4486, 5PE.4488, 5PE.4489, 5PE.4493, and 5PE.4495) is a well-know property in Pueblo, but the site form states research yielded no information. Were local resources used to understand the local history?
- The Historical Background (item 35) does not include the history of the surveyed property. Often the history is for the overall neighborhood.
- On many of the site forms, the Architectural Description (section III) does not match the attached photographs.
- Many of the site forms have assembly errors, such as the house addresses not matching the location maps or the attached photographs not matching the house addresses.
- The Goat Hill Management Data Form is confusing. The form has contradicting information in the text and charts. The chart found on page 9 of 9 is in direct contradiction to the loose chart on oversized paper. The finding that the historic district is significant at the state level of significance is not justified in the form.
- Some of the forms, especially in the Mineral Palace Park Historic District, use the tax assessor's default date of 1900. From staff review, we were able to determine that many of the buildings were either built before or after the 1900 default date. Some forms also have conflicting information on the date of construction, such as 5PE.4493 states both 1882 and 1920 as dates of construction. It is not clear which date is used in the discussion of significance in item 42.
- Many of the site forms only have one photograph attached and sometimes the view of the house is obscured by a fence or trees.

The above comments are general in nature, but apply to the site forms that we were not able to complete an evaluation.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Coordinator, at (303) 866-4678.

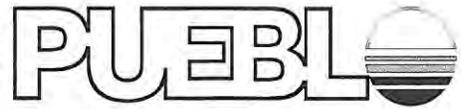
Sincerely,

for 
 Georgianna Contiguglia
 State Historic Preservation Officer

Historic Preservation Commission

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Susan Pelto, Chair
Donna Alber
Deborah Espinosa
Tanya Jones
Mark Mihelich
Kerelyn Trent
Gary L. Trujillo



October 12, 2007

From: Wade Broadhead, Land Use Planner and Susan Pelto, Chair Historic Preservation Commission
Through: Jerry Pacheco, Assistant City Manager of Community Development

Mr. Brad Beckham
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Avenue
Shumate Building
Denver, CO 80222

Dear Mr. Beckham:

We thank you for the opportunity to provide consultation on over 800 historic resources your consultant documented as part of the New Pueblo Freeway project in accordance with Section 106 of the National Historic Preservation Act. City of Pueblo staff attempted to coordinate a response between Historic Pueblo, Inc., The Bessemer Historical Society, Pueblo County Historical Society, interested citizens, and residents of the East Mesa and Goat Hill neighborhoods. This fall was a busy time for all involved and we were not able to review the forms in as much detail as we would have liked, and we thank you for your extension. We did, however, have a number of Historic Preservation Commissioners, HPI members, and interested citizens who live in the proposed areas provide feedback on the work. Unfortunately, we were not able to review every site form. The forms in Box 3 pertaining to the Bessemer District were the ones examined in the least detail. The following letter addressed some global issues with the product, makes suggestions, and ends with a list of sites that we disagree with your consultant's recommendations.

The review effort consisted of five of the seven historic preservation commissioners, City Staff, members of Historic Preservation, Inc., a preservation specialist/director of the Pueblo County Historical Society, and other amateur local historians with a great wealth of experience with Pueblo. The reviewers utilized both the hard copy forms and the digital copies via their home computers, so both resources were valuable to our effort. We are lucky enough to have many volunteers who helped without compensation. All reviewers involved noticed some of the same 'global' issues with the product, and many arrived at their findings independently. We have attached their unedited comments in cases where we received a formal letter describing their review (attachments #2 and #3).

We understand that this is one of the largest historic survey projects in CDOT's history and appreciate the enormous effort that must have gone into the draft report and site forms. However, the product that we reviewed does not appear to be finished. The numbers of errors, inconsistencies, and lack of historical information made it difficult for us to effectively agree or disagree with your

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consultant's recommendations. We will first address the context and general comments, then the site forms, and finally present the sites we either disagree with their recommendations of eligibility, or do not have enough information to make the decision.

Context Study and General Comments

The context study was filled with important information and touched on a number of important themes important for the development of the City. However, we would like to point out a few errors and omissions in the text. We also wanted to make some 'global' or universal comments that affect both the context report as well as the individual site forms.

- 1) The Goat Hill Historic District is not in Goat Hill. After a meeting with some of the long time residents of the area, Goat Hill is the area south of 1st Street. The area proposed as a National Register Historic District is north of 1st street and has a different shared history. Although your researchers got the history of Goat Hill right, they got the location wrong. The proposed district is made up of larger Victorian homes predating the biggest Italian immigration waves of the early 1900s. The residents of Goat Hill knew the large Victorians only as boarding homes. An appropriate name may be the Bradford or Patton (subdivision) historic district. Further research predating the Italian immigration should be conducted to determine prominent members of this community. Also, there was no church in the Goat Hill neighborhood proper (see bottom of first paragraph in section 5.2.2 paragraph).
- 2) We don't understand why the Grove and East Mesa neighborhoods are not eligible while the Bessemer and Goat Hill districts are eligible for the National Register district. In some cases portions of the Grove and East Mesa areas have more integrity than the proposed districts. Not having a thorough history of alterations limits our ability to concur with your recommendations. Also, the Nuckolls Packing Plant should be mentioned as an important part of the Grove landscape.
- 3) The Blocks neighborhood description is wrong. The Blocks is a thin swath of homes in the curvilinear streets directly abutting the bluff. The area west of Abriendo, on normally platted street networks is called Mesa Junction. Originally it was called Mesa, but 'The Mesa', currently refers to St. Charles Mesa. Numerous reviewers who lived in the area objected to the area west of Abriendo being considered part of the Blocks (originally called Corona Park). The Blocks proper have a specific and different historical development and demographic than the areas across the street. Recently the City conducted a neighborhood survey for the blocks area and it only covered the winding streets east of Abriendo to the bluffs edge. Please revise the map on Figure 4.3.
- 4) The flood of 1921 is only mentioned indirectly in the Grove neighborhood history instead of being in the main historical timeline. The 1921 flood was a pivotal moment in Pueblo's history and it greatly affected neighborhoods in the study area and the City as a whole. More discussion about the direct and indirect impacts to the study area is needed.
- 5) Section 4-10 talks about the settlement of Pueblo around streetcar lines. Although this is true, the original development was around the 'speculative city' model of platted 25-foot lots prior to the streetcar. As far as we understand the streetcar dropped its line onto the existing street grid and the development then grew off of those established lines.
- 6) Although it is one of your three specific APE themes one of them was: 2) Pueblo's *Ethnic Heritage and the Influences of Ethnic Groups on Pueblo's Past*, the realization of this theme is woefully underrepresented in the site form data. Your consultants did not identify any patterns in your data at all despite having to inventory some of the largest, original, ethnic enclaves in Pueblo. Without a detailed history of the political, social, and neighborhood histories it was

impossible to identify important locations or residences. Your themes were not translated very well into the actual study, which was little more than a simple inventory of homes. One example of these missed patterns in that data was evident in Goat Hill. There are a number of building periods on Goat Hill, with one occurring during 1922. One of our Pueblo Work's Engineers is the grandson of one of those original Goat Hill residents and he states that one (or many) of those houses was actually moved to Goat Hill from the lowlands after the flood. So beyond representing your #2 theme perfectly as a strong ethnic community, some of that construction is strongly associated with an important event in Pueblo's history and the reaction to that event. Finally, if your histories do not have enough detail it is impossible to determine what type of influence that had on Pueblo's history. After meeting with Goat Hill and East Mesa residents we realized that numerous original families went on to heavily influence the city.

- 7) A number of researchers pointed out inconsistencies with the eligibility statements for the Northern Avenue Commercial District. Some of these places were important parts of the community and fit in with your grocery store and 'watering holes/bar' histories. Some of the buildings have only slight modifications, and even some of the modifications may be historic.
- 8) Many commissioners and volunteers have issues with the Bessemer Historic District. The approach appears to be "broad-stroke" and numerous properties are included that have been seriously compromised. Also, we find it strange that a district can be so large with only one or the steel mill individually eligible property. We believe there should be more detail and discretion with this district. Perhaps a series of mini districts where integrity is high would be more appropriate.
- 9) Many volunteers and commissioners were dismayed to see some of the city's most important remaining, neighborhood grocery stores and bars recommended as ineligible. These 'ethnic town halls' acted as places where people could eat and drink, but also provided commercial, distribution, and economic services as well as important social services for the neighborhoods. Your own context study spends a great deal of time talking about these types of resources and it was baffling to see them recommended as ineligible. These structures are almost never unaltered, but many of the alterations took place over 50 years ago. Also, the commercial building attached to a residential house is the model for these types of resources and an important part of the social and architectural history, not a reason to recommend it as ineligible. Places like Gus's, Gaglianos, Zolseman's, Eilers, and Martices (in Goat Hill) are a crucial link to Pueblo's past, and even more important today because many are still operating. Your context survey seemed to understand the importance of these places, but your field researchers failed to recognize and nominate them as eligible for preservation.
- 10) Finally, we find it hard to believe that besides the proposed historic districts that only 15 other structures are eligible. Again without a history of alterations and social background for the homes and structures it is impossible to concur with your recommendations. The ethnic and labor history of Pueblo is difficult to incorporate into a research design, but it is important to highlight this important history that represented so many individuals in Pueblo. If, like your consultants claim, that many of these areas have lost integrity, then some of the few structures or blocks that do retain integrity should be eligible for preservation. Staff recognizes that a lot of historic integrity has been lost in Pueblo, and that perhaps, mini-districts composing small blocks could be nominated.
- 11) We saw at least two forms saying no historical info for Star Nursery was found, even though it still exists about two doors away.
- 12) We noticed the row of shacks on Greenwood south of 29th St. still considered part of the "affluent" Mineral Park neighborhood. Perhaps they shouldn't be considered part of the neighborhood. ("Sharps" Addition.) In general we found that the APE sites in the Mineral

Palace Park Historic District are not closely associated with the history of the affluent history of the greater North Side. The City is currently reviewing an application for a local historic North Side District that is much farther to the west and south of the APE study area. The area in the APE study area is largely lower middle class, later infill.

- 13) We have noticed many broad, blanket statements without justification, e.g., “an unsympathetic addition”. Why are some alterations unsympathetic? If the alteration does not show in a photo, how can we tell?
- 14) When it comes to additions, the Assessor’s Office Records are suspect (according to the forms, which frequently say “An addition...”, but “No additions...according to Assessor’s office), but accurate when it comes to the “Actual” date of the building, frequently 1900 (usually an incorrect construction date) Any building with a wing or an L-shape is assumed to have an addition, regardless of what the Assessor’s office says.

Site Forms

In many cases our reviewers were disposed to agree with the overall assessment of eligibility but noticed mistakes in the site forms, incorrect or incomplete information. We acknowledge that although many of these neighborhoods are still strong ethnics enclaves, they may have lost architectural integrity to such a degree that they are no longer eligible for the NRHP. I will address some of the major areas where we encountered:

Date of construction. The dates of construction were often listed as 1900 since that is the date when the assessor’s office lost most of their records in a flood. However, any historical architect would realize that the styles of the homes place them at an earlier date. Reverse Directories (Polk Directories), Sanborn’s, and original plats exist and can be consulted to at least find a date range of construction. This problem is very apparent when looking at the homes near the Steel Mill. It is difficult to assess a neighborhood’s development and significance if it was built in 1885 as one of the first residential developments adjacent to the Steel Mill, and it is listed as 1900. We would like to see more detailed dates of construction or at least date ranges based on research, recording of the original plat, and architectural styles 1895-1900 etc.

Architectural styles. The architectural descriptions are sometimes too vague and inaccurate. Too many homes are labeled “no style” when clearly they have a plain vernacular style. After Consulting *Houses By Mail: A Guide to Houses From Sears, Roebuck and Company* (Stevenson and Jandl: 1986), most of the homes in many of the neighborhood appear to be Sears Kit or Sears inspired buildings. We would like to see more refined descriptions and accurate assessment of styles. If enough homes are “no style” then simply identify and name a vernacular style or sub style of some other larger movement. Also, one picture is not enough to agree with the recommendations in most cases. When descriptions of side and rear facades are mentioned as ‘losing integrity’ and we have no pictures, it becomes impossible to agree or disagree with your recommendations.

Historical Background. This section on the site forms is perhaps the most glaring example of what we thought of as “incomplete”. Almost all of the forms list the first owner, or what appears to be one of the first owners and then states that no additional information could be found. A number of recent survey reports from the City as well as a number of volunteer nominations have unearthed tremendous data on even the most modest residences. We understand that the level of historic research for 800 homes cannot be the same as an individual National Register property. Yet, without sufficient information about the early residents, we cannot determine if the home has significance. The commission needs additional information regarding chains of ownerships and associations with local/regional business owners and political figures. Even if many of these buildings have lost

integrity we need to know the original histories of these places to make a firm assessment. We have been told by other researchers that Pueblo has a very good database of historical resources for this type of research. If your consultants need some guidance about where these things are located we would be happy to do all we can to assist.

Many of the names of the original owners of modest homes in the Goat Hill and Bessemer neighborhood are prominent family names in Pueblo's history or have members currently shaping the city's future. The survey report and historical context specifically mention the development of neighborhoods and ethnic history as important features of Pueblo's history, but the overarching themes do not seem to be carried over into the site forms. Numerous examples of completely intact modest worker/laborer housing are not listed as eligible, nor are specific blocks with high degrees of integrity listed as small districts.

Integrity Statements.

A number of our reviewers pointed out that there were a number of inconsistencies between the Section 42/43 statements. Houses with good integrity are then said to be not eligible because of loss of integrity. "Loss of integrity" appears to be rather inconsistent as well throughout the document. Without adequately addressing the later history of modifications to specific neighborhoods (Goat Hill, Bessemer, East Mesa) the authors assume that stucco was a later addition when in some cases it may have been original. The nature and types of changes may have also reflected specific historical conditions related to the local change in demographics or economics. City Staff has a large archive of WPA photos from 1938 of the entire city, which we would be happy to provide them as a resource to look at changes through time on modest worker housing.

Some reviewers noted that very small things were being used to recommend a home as ineligible for the NRHP. If a house has original wood windows but aluminum storm windows it could be noted as 'lost integrity'. The commission has a problem with so much of the City being deemed ineligible without really addressing the unique working class and ethnic history that built the City.

Sites With Disagreements

The following is a list (#1) of sites that the reviewers in Pueblo disagree with the consultant's recommendation. In many cases we disagreed because we didn't have enough information, but in others we disagreed because we felt the social history or the architectural history was sufficient and important enough to warrant it as eligible for the NRHP.

We all found this to be a very difficult task due to the unique nature of old worker class housing which does not weather the elements as well as the Rosemount Mansion. However, we feel these resources and their histories are important, and that we need to know more about the original construction styles and techniques. We do not want to write off the entire history of Pueblo because of stucco. In some cases stucco was used historically and in some cases it was reapplied historically and may have been a way for peoples from Italy and New Mexico (or Mexico) to associate with their homelands or blend in to Pueblo's climate which is more related to Santa Fe than Connecticut or Chicago.

Attachments:

- 1. Sites with Disagreements / non-concurrence list**
- 2. PCHS/Burrer letter**
- 3. Clay letter**

- 5PE 4852 Window replacement may diminish integrity, but is that the only cause for non-contribution?
- 5PE 4905 Is stucco original?
- 5PE 4954 Disagree with non-contribution. Warrants further investigation.
- 5PE 4958 Disagree with non-contribution. Warrants further investigation.
- 5PE 4961 If lack of windows leading to diminished integrity is the cause for non-contribution, how can this be determined if they don't even know if the windows exist under the boards?
- 5PE 4963 If lack of windows leading to diminished integrity is the cause for non-contribution, how can this be determined if they don't even know if the windows exist under the boards?
- 5PE 4965 This building has more storefront modifications than most in the proposed district. How can this be contributing? Arbitrary decision.
- 5PE 4968 Warrants further investigation. Not enough photographs.
- 5PE 5120 This building has burned down. Should not be included in inventory, or if it is, noted as non-extant.
- 5PE 5134 Conflicting statements of significance. Stucco appears to be original.
- 5PE 5164 Windows appear original in the photo provided. Only storms have been added. Warrants further investigation
- 5PE 5165 Good integrity, yet is non-contributing @ 1953. What is the cutoff for the period of significance?
- 5PE 5169 Windows appear original in the photo provided. Only storms have been added. Warrants further investigation
- 5PE 5175 Date of 1953?
- 5PE 5176 Date of 1957?
- 5PE 5177 Date of 1958, but is listed as being contributing to the district. Explain.
- 5PE 5186 Stucco appears to be original.
- 5PE 5188 Fenestration modifications of what type? Not enough photographs are provided for a reviewer to confirm this determination.
- 5PE 5194 Stucco appears to be original.
- 5PE 5205 Has a clearly incompatible additions, yet is listed as contributing. Disagree.
- 5PE 5209 Diminished integrity. Should not be listed as contributing.
- 5PE 5210 Conflict in statements of physical integrity.
- 5PE 5224 Diminished integrity. Should not be listed as contributing.
- 5PE 5228 Diminished integrity. Should not be listed as contributing.
- 5PE 5229 Diminished integrity. Should not be listed as contributing.

- 5PE 5237 Date of 1956?
- 5PE 5238 If there is are side and back additions that cause this property to be non-contributing, more photographs must be provided to determine this.
- 5PE 5296 Physical integrity slightly diminished, but is significant. Associated with CF&I.
- 5PE 4541 Association with J.K. Sweeney warrants local significance, and eligibility in the NRHP.
(Goat Hill Dist.)

New Pueblo Freeway Section 106 Sites With Disagreements

BOX 1			
SITE NUMBER	ADDRESS		
5PE4490	1924 N. SANTA FE AVE.		
5PE4531	315-317 E. 4TH ST.		
5PE4533	319-321 E. 4TH ST.		
5PE4537	307 BRADFORD AVE		
5PE4539	403 E. 4th St.		
5PE4540	403 E. 4th St.		
5PE4542	320 E. 4TH ST.		
5PE4545	212 E 3rd st		
5PE4546	304 BRADFORD ST		
5PE4564	321 E. 2nd ST		
5PE4566	311 E. 3RD ST		
5PE4701	525 MOFFAT		
5PE4705	513 MOFFAT		
5PE4707	508 MOFFAT		
5PE4718	602 MOFFAT		
5PE4725	601 STANTON		
5PE4733	501 STANTON		
5PE4746	921 CURRIE		
5PE4777	118 ARROYO		
5PE4778	120 ARROYO		
5PE4771	103 SUMMIT		
5PE4785	1136 ELM ST.		
5PE4579	332 E. 1ST. ST		
5PE4577	316 E. 1ST. ST.		
5PE4585	311 RIVER		
BOX 2			
SITE NUMBER	ADDRESS		
5PE4810	1214 ELM ST.		
5PE4812	1218 ELM ST.		
5PE4813	1220 ELM ST. Gaglianos		
5PE4821	1232 - 1234 ELM ST.		
5PE4837	1203 ELM ST.		
5PE4838	1201 ELM ST.		
5PE5000	611 E. ARROYO		
5PE5005	713 E. ARROYO		
5PE5008	700 TOPEKA AVE		
5PE5014	715 TOPEKA AVE		
5PE5016	706 HILL PL		
5PE5019	716 HILL PL		
5PE5020	413 RUSH ST.		
5PE5025	1004 EGAN AVE		
5PE5028	1048 S. SANTA FE		

5PE5035	1018 S. SANTA FE		
5PE5036	1012 S. SANTA FE		
5PE5037	1008 S. SANTA FE		
5PE5039	1000 S. SANTA FE		
5PE5040	1040 1/2 S. SANTA FE		
5PE5041	1109 S. SANTA FE		
5PE5043	422 KELLY AVE		
5PE5044	410 KELLY AVE		
5PE5045	412 KELLY AVE		
5PE5046	771 S. SANTA FE		
5PE5050	736 MOFFAT AVE		
5PE5051	734 MOFFAT AVE		
5PE5052	410 W. 28TH ST.		
5PE5053	414 W.28TH ST.		
5PE5054	2701 N. GRAND		
5PE5055	2725 N. GRAND		
5PE5056	409 W. 27TH ST		
5PE5059	2224 N. MAIN		
5PE5067	421 BEECH ST.		
5PE5073	425 BEECH ST.		
5PE5076	416 KELLY AVE		
5PE5080	200 S. SANTA FE		
5PE5081	210 S. SANTA FE.		
5PE5082	641 ELM ST.		
BOX 3			
SITE NUMBER	ADDRESS		
5PE5206	2017 E. EVANS AVE		
5PE5207	2011 E. EVANS AVE		
5PE5211	2100 E. ROUTT		
5PE5212	2110 E. ROUTT		
5PE5218	2140 E. ROUTT		
5PE5219	411 AQUA AVE		
5PE5220	2131 E. EVANS		
5PE5221	2121 E. EVANS		
5PE5222	2119 E. EVANS		
5PE5223	2117 E. EVANS		
5PE5224	2113 E. EVANS		
5PE5227	2101 E. EVANS		
5PE5228	402 INDIANA AVE		
5PE5229	410 INDIANA AVE		
5PE5232	2012 E. EVANS		
5PE5234	2018 E. EVANS		
5PE5235	2022 E. EVANS		
5PE5237	2028 E. EVANS		
5PE5238	2032 E. EVANS		
5PE5243	2114 E. EVANS		
5PE5244	2118 E. EVANS		
5PE5246	2124 E. EVANS		

5PE5248	2210 E. EVANS		
5PE5254	2300 E. EVANS		
5PE5255	2308 E. EVANS		
5PE5268	2428 E. EVANS		
5PE5269	2430 E. EVANS		
5PE5271	2516 E. EVANS		
5PE5273	2526 E. EVANS		
5PE5274	2530 E. EVANS		
*Pueblo either disagrees with the recommendation of eligibility on all these sites, or does not have sufficient information to concur with the consultants recommendation.			
City of Pueblo and Pueblo Historic Preservation Coordinated Review, August through October 12, 2007.			

October 11, 2007

Wade Broadhead
Land Use Planner
Department of Community Development
City of Pueblo 211 E. 'D' Street
Pueblo, Colorado 81003

Wade:

After reviewing the required documentation to comply with Section 106 guidelines in the Area of Potential Affect of the New Pueblo Freeway Project, I have a few concerns with the quality and accuracy of the forms provided.

1. The inventory forms provided include minimal information as a basis for determination for NRHP Districts, and individual listings. Even if a property were eligible, the information is not enough to form a concrete basis to that fact. The forms lack proper pictures indicating the features of the property, and usually only show the primary façade.
2. Detailed information about the contexts of the districts, the Bessemer/Minnequa Heights District in particular, is lacking. The same statement of significance and history is neither adequate nor appropriate for the entire broad-range district proposed. The two neighborhoods are distinct, and I cannot see how the two can be incorporated into one district.
3. Information included in each form in the statement of significance repeatedly refers to what should be important facts about the property or district as "probably due to" or "could be because." Was there not proper research to determine if something that affects the significance is a fact, and not speculation?
4. For the time that the consultant had to prepare the forms, including the delays in getting us the forms, the work presented appears hastily prepared, and not enough time was spent to properly conduct an inventory of each property, and to form substantial contexts for the districts in question. Determination of eligibility of a property is arbitrary and subjective, as is the case with stuccoed properties, and the age of the property.

It is therefore my recommendation that the forms be revised by the consultant to provide adequate information to determine potential districts and important site that lie within the APE. I do not believe that as the forms are prepared currently, they could not be used to adequately determine what properties in the APE are eligible and

important to our history. I will follow up with a list of specific property forms I have issues with.

Thank you for allowing me the opportunity to review this work.

Best Regards,

A handwritten signature in black ink, appearing to read "Weston Burrer". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Weston Burrer

Director

Pueblo County Historical Society

September 18, 2007

Hello Wade,

I have reviewed all of the site forms in boxes 1 & 2. This includes the proposed districts of both Mineral Palace and Goat Hill. A few of the sites were missing from the disc and were therefore not re-evaluated.

In most cases, I would agree with the evaluations performed by the agency for the Colorado Historical Society-Office of Archaeology Historic Preservation. There are some notable exceptions which I have coded accordingly. Some properties may warrant a physical inspection or further research to determine whether or not they in fact may be eligible for either NRHP or Local designation.

The areas along the I-25 corridor retain very little or none of its original historic fabric. Many of the houses in these areas are small modest dwellings which have been altered and substantial architectural and historic integrity has been lost. It is unfortunate that almost without exception, many of the structures have been re-muddled with the replacement of windows, roofs, additions and stucco sheathing over brick and wood siding. While a number of houses exist that were originally constructed in the late 19th or early 20th century, many lack any identifiable architectural style.

According to the agencies evaluation, the age of many of the properties, indicate a construction date of 1900. This is probably based on the age reported by the Pueblo County Assorts office and is without doubt inaccurate. I did not indicate the discrepancy on the matrix unless the property was in question regarding its eligibility for either Local or NRHP designation.

If you have any questions regarding my review or need further help on this matter, please do not hesitate to contact me. I am sorry I did not get further along in the review, but time did not permit. Thanks for letting me help with this project, it has been most interesting.

Regards,

Kermit Clay

F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 8, 2008

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Eligibility Determinations for Five Historic Districts, CDOT Project IM 0251-156, I-25,
New Pueblo Freeway Environmental Impact Statement

Dear Mr. Nichols:

This letter and the enclosed materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for concurrence on Eligibility Determinations for the Environmental Impact Statement (EIS) referenced above. The purpose of the EIS is to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). We previously consulted with your office regarding the Area of Potential Effects (APE) and survey methodology in a series of meetings in 2002 and 2003, and via correspondence in September 2004. In July 2007 we submitted eligibility determinations for your review and in June 2008 FHWA and CDOT met with your staff and the consulting parties to discuss assorted historic properties issues. This submittal includes eligibility determinations for five proposed historic districts along the project corridor.

Eligibility Determinations

CDOT has identified five proposed neighborhood historic districts that are recommended eligible to the National Register of Historic Places: the North Side Neighborhood (5PE5517), Second Ward (5PE5518), Grove (5PE5519), Blocks (5PE5520), and Steelworks Suburb (5PE5523). Please see the attached management data forms for more information about the district potential of these resources.

Several of the proposed districts were identified with different names and boundaries in previous consultation, but additional research and fieldwork assisted CDOT in making the revised determinations provided in this submittal. In the July 2007 consultation, CDOT identified three proposed districts: the Mineral Palace Park Neighborhood (now the North Side Neighborhood district), the Goat Hill Neighborhood (now the Second Ward district), and the Bessemer/Lake Minnequa Neighborhood (now part of the larger Steelworks Suburb district). CDOT also described several neighborhoods in the survey report in July 2007 that were not identified as districts but are now recommended as proposed districts (the Grove and Blocks Neighborhoods) or are part of a larger proposed district (East Mesa and Minnequa Heights Neighborhoods).

We request your concurrence with determinations of eligibility and proposed boundaries for these five districts. Your response is necessary for the Federal Highway Administration's compliance with Section

106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's regulations.

We have sent this same submittal to the City of Pueblo Planning Office and will provide a copy of their response once we receive it. As you know, the City of Pueblo has agreed to facilitate the review of these materials with the other Section 106 consulting parties for this project.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Management Data Forms for 5PE5517, 5PE5518, 5PE5519, 5PE5520, 5PE5523
Map of potential districts
Photos of Grove Neighborhood

cc: David Miller, CDOT Region 2
Dick Annand/Judy DeHaven, CDOT Region 2 Env.
Chris Horn, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 8, 2008

Mr. Wade Broadhead
Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 East D Street
Pueblo, CO 81003

SUBJECT: Eligibility Determinations for Five Historic Districts, CDOT Project IM 0251-156, I-25,
New Pueblo Freeway Environmental Impact Statement

Dear Mr. Broadhead:

This letter and the enclosed materials constitute the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT)'s request for comments on Eligibility Determinations for the Environmental Impact Statement (EIS) referenced above. The purpose of the EIS is to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). We previously consulted with your organization regarding the Area of Potential Effects (APE) and survey methodology for this undertaking in a series of meetings in 2002 and 2003. In July 2007 we submitted eligibility determinations for your review and in June 2008 FHWA and CDOT met with staff from the State Historic Preservation Officer (SHPO) and the consulting parties to discuss assorted historic properties issues. This submittal includes eligibility determinations for five proposed historic districts along the project corridor.

Eligibility Determinations

CDOT has identified five proposed neighborhood historic districts that are recommended eligible to the National Register of Historic Places: the North Side Neighborhood (5PE5517), Second Ward (5PE5518), Grove (5PE5519), Blocks (5PE5520), and Steelworks Suburb (5PE5523). Please see the attached management data forms for more information about the district potential of these resources.

Several of the proposed districts were identified with different names and boundaries in previous consultation, but additional research and fieldwork assisted CDOT in making the revised determinations provided in this submittal. In the July 2007 consultation, CDOT identified three proposed districts: the Mineral Palace Park Neighborhood (now the North Side Neighborhood district), the Goat Hill Neighborhood (now the Second Ward district), and the Bessemer/Lake Minnequa Neighborhood (now part of the larger Steelworks Suburb district). CDOT also described several neighborhoods in the survey report in July 2007 that were not identified as districts but are now recommended as proposed districts (the Grove and Blocks Neighborhoods) or are part of a larger proposed district (East Mesa and Minnequa Heights Neighborhoods).

As a local preservation organization with an interest in these historic resources, we welcome your comments regarding our determinations of eligibility. It is our understanding that your office will facilitate the review of these materials with the other Section 106 consulting parties for this project. We have enclosed an additional set of site forms, map, and photos for distribution to the other consulting parties. We appreciate your efforts in this regard. Your response is necessary for the Federal Highway Administration's compliance with Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's regulations.

We have sent this same submittal to the SHPO for review. Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,




Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Management Data Forms for 5PE5517, 5PE5518, 5PE5519, 5PE5520, 5PE5523 (2 sets)
Map of potential districts (2 copies)
Photos of Grove Neighborhood (2 copies)

cc: David Miller, CDOT Region 2
Dick Annand/Judy DeHaven, CDOT Region 2 Env.
Chris Horn, FHWA



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

October 27, 2008

Brad Beckham
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: CDOT Project IM 0251-156; I-25 Pueblo Freeway Environmental Impact Statement; Determinations of Eligibility. (CHS #44746)

Dear Mr. Beckham,

Thank you for your correspondence dated and received on October 8, 2008 and for the additional information received by email on October 24, 2008 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided additional information, we concur with the recommended finding of potentially eligible and boundaries for the National Register of Historic Places for the resources listed below.

- 5PE.5517; North Side Neighborhood Historic District
- 5PE.5518; Second Ward Historic District. Under Item 10 of the Management Data Form, information is provided on why the Goat Hill neighborhood, located south of 1st Street, is not included in Second Ward Historic District. Was the Goat Hill neighborhood evaluated as a separate potential historic district?
- 5PE.5520; The Blocks Historic District.
- 5PE.5523; Steelworks Suburbs Historic District.
- 5PE.5519; The Grove Historic District.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,


Edward C. Nichols
State Historic Preservation Officer

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



November 13, 2008

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Determinations of Eligibility for Archaeological Sites, CDOT Project IM 0251-156, New Pueblo Freeway EIS, Pueblo County

Dear Mr. Nichols:

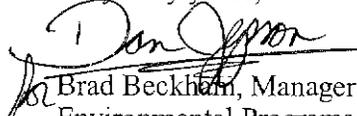
Enclosed for your review is the archaeological resources survey report and associated site forms for the project referenced above. The Federal Highway Administration and Colorado Department of Transportation (CDOT) are preparing an Environmental Impact Statement to address potential social, economic and environmental impacts resulting from improvements to approximately seven miles of Interstate 25 through the City of Pueblo. Proposed modifications will include highway widening, realignment of dangerous curves, improved access at entrance and exit ramps, and other improvements to expedite the flow of traffic. Archaeologists with consulting firms WCRM and CH2MHill, under contract to CDOT, conducted a survey of the Area of Potential Effect (APE) between 2003 and 2005, undertook test excavations at a small sample of sites, and authored the report. As noted in the report, the APE was established in coordination with your office and several local consulting parties, and documentation to that effect is in your files.

The survey resulted in the documentation of 127 historic archaeological sites, the majority of which consist of vacant lots exhibiting varying degrees of visible archaeological evidence, subsurface potential, and/or associated archival data. Eight sites selected at random were subjected to test excavations, of which five were evaluated as eligible for the National Register of Historic Places (NRHP). Eighty-six (86) sites are assessed as needing additional data prior to completing a final NRHP evaluation, and 36 sites are recommended not eligible. As noted in the report, the large number of "need data" localities is a result of lack of permission to access most of the private properties within the APE, and therefore having to complete archaeological assessments from property boundaries (coupled with available archival information).

A copy of the report and site forms has been provided to Wade Broadhead at the City of Pueblo, who has agreed to facilitate review of the materials by the local consulting parties (including the City Planning Office, Pueblo Historic Preservation Commission and Bessemer Historical Society). We will forward any comments received from the consulting parties to you when received.

We request your concurrence with our determinations of eligibility as outlined above and in the enclosed documents. An atlas consisting of aerial photos of the APE that show the location of each site is also enclosed to facilitate your review. Please note, however, that the atlas is provided as a general finding aid and should not be utilized to infer effects to archaeological resources; a formal effects finding will be submitted to you at a later date. If you have questions about this submittal please contact CDOT Senior Staff Archaeologist Dan Jepson at (303)757-9631, or via Email at daniel.jepson@dot.state.co.us.

Very truly yours,

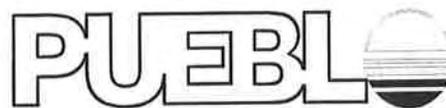

Brad Beckham, Manager
Environmental Programs Branch

Enclosures

Historic Preservation Commission

211 East D Street
Pueblo, CO 81003
719-553-2259 (Phone)
719-553-2359 (Fax)
719-553-2611 (TTY)
www.pueblo.us

Susan Pelto, Chair
Donna Alber
Deborah Espinosa
Tanya Jones
Mark Mihelich
Kerrellyn Trent
Gary L. Trujillo



November 24, 2008

From: Wade Broadhead, Land Use Planner and Mark Mihelich, Chair Historic Preservation Commission

Through: Jerry Pacheco, Director of Planning and Community Development

Mr. Brad Beckham
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Avenue
Shumate Building
Denver, CO 80222

Dear Mr. Beckham:

We thank you for the opportunity to provide consultation on the proposed potential historic districts your consultant documented as part of the New Pueblo Freeway project in accordance with Section 106 of the National Historic Preservation Act. City of Pueblo staff attempted to coordinate a response between Historic Pueblo, Inc., The Bessemer Historical Society, and Pueblo County Historical Society. We were not able to get a thorough review by as many parties as we did with the first batch of site forms, however most people felt the work was generally of a much higher standard that it didn't warrant extensive review by numerous volunteers. We feel that the consultants captured most of the social history and now have the approximate boundaries of each "neighborhood" as well as the major overriding themes of each. Staff and the Chair of the HPC did review the forms and identified a few areas of concern.

- 1) **Goat Hill:** We acknowledge that Goat Hill is the most problematic area in the survey corridor. We felt that your consultant did a good job discovering the history of the landform, but may not have divided it correctly. I think the Second Ward form is very good, and identifies that there is an older, different area of significance north of 1st Street. The paragraph that talks about the "Goat Hill" area as being ineligible is probably correct. However, we would probably prefer to see a separate form with the history, pictures, and then the same statement of "insignificance" documented on the Second Ward forms. Just because Goat Hill is probably not architecturally significant doesn't mean we shouldn't identify it as a separate neighborhood, and just say that it no longer conveys its original significance due to alterations. Extend the Goat Hill Boundary to Clearance Road, and perhaps mention some of the neighborhood that used to be there before the flood of 1921, and the separation by the highway in the 1950s.

*The programs and services of the City of Pueblo are accessible to people with disabilities. For accessibility information contact the Planning & Land Use Administration Departments at 719-553-2359 (TTY users – 719-553-2611).
The City of Pueblo is an Equal Opportunity Employer.*

- 2) **Steelworks Suburb.** One reviewer noted that the Greek Orthodox Church was built in 1907 not 1927. I think you are thinking about St. Paul's Russian Orthodox, which moved circa 1923.
- 2b) The boundary of the district is problematic. We understand the intent and we agree that the mill functions as the pivotal point of the district, but you could also say that major portions of the town are associated with that district as well. As drawn, the district does not convey a unified period or history nor do they incorporate the great sub-neighborhood diversity the HPC would probably want to landmark at some point. I would advocate for a Bessemer District, and then an East Mesa district as it actually has a quite different time frame and evolution in many ways (post Flood boom and 1940s boom). We feel the large boundary compresses too much history into one large district that fails to convey the original significance and may make later smaller district nominations problematic.
- 2c) Under early building types, you fail to mention that Queen Anne, and especially Queen Anne cottages, are the predominate building stock in much of the older parts of Bessemer.
- 2d) Additional information of how the district was platted, and built out (i.e. Minnequa Town Company) here would be helpful.
- 2e) The integrity of the area is suspect. There should be a much more detailed statement about the integrity of the homes in the district. We notice that there are great blocks here and there but differed maintenance, vacant homes, and the pervasive stucco alterations have greatly reduced the integrity of the area as a whole, making surviving pockets that much more significant. As much as I love, respect, and appreciate the history of Bessemer, large pockets no longer convey the feeling of a Steelworks Suburb in the stated period of significance from a NRHP perspective.
- 2f) The architecture and housing section is a bit weak and uninformed. The majority of the houses do have a style, and the author could even go as far as naming vernacular styles present in the study area if he/she could not identify a style. Norman cottages are very rare in the Steelworks area, although craftsmen bungalows are common. The 1880s-1930 building boom should be discussed and identified in greater detail. The pre-1930s building boom may help refine district boundaries. Mentioning some items about the styles, locations, and association with time frames when the mill was booming versus busting would be helpful.
- 2g) The discussion of ethnicity is a little weak, since it is probably the basis for much of the significance of the residential area near the steel mill.
- 2h) What is the status of the Mill? Our commission is very worried about the sudden loss of crucial structures at the mill and how the mill will function in this historic district.
- 3) **Blocks-** Corona Park would be a better historic name for the "historic district". The Blocks is probably a better name for the current, living neighborhood.
- 3b) Corona Park has a great history and a very intentional design by Palmer, who hired John Blair, an early landscape artist from Chicago, to lay out the pattern in a fashion based off of Riverside in Chicago (Riverside is now named as a seminal piece of subdivision work shown in all planning books). The layout of the area is absolutely crucial to understanding its significance and meaning. The words "Corona Park" were cast in concrete and placed on the bluff slope under 229 Midway, and feature prominently on all 1930s photos of Mesa Junction/Blocks. Corona Park has a very interesting history associated with Palmer and his vision for South Pueblo, I'm not sure the history captured all that makes the area significant.
- 4) **Grove-** Discussion of the impact of the Alpha Beta packing plant is absent, otherwise I agree with most of the statements. The one comment about resettling in the same location after the flood is a little off base from our records. I've found that many people relocated to the northern portion of the East Mesa neighborhood after the flood, as well as other parts of Bessemer, the Russian Orthodox Church and congregation being a prime example.

We will be happy to provide any further information or discuss any of the above-mentioned items during the consultation process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wade Broadhead".

Wade Broadhead
Planner
City of Pueblo
719-553-2248

December 5, 2008

Brad Beckham, Manager
Environmental Programs Branch
Department of Transportation
4201 E. Arkansas Avenue
Shumate Building
Denver, Colorado 80222

Re: Determinations of Eligibility for Archaeological Sites, CDOT Project IM 0251-156, New Pueblo Freeway EIS, Pueblo County (CHS #43967)

Dear Mr. Beckham,

Thank you for your correspondence dated and received by our office on November 13, 2008 regarding the subject project. Following our review of the inventory report and accompanying site forms, we offer the following comments:

We concur with your determination that 5PE5408, 5PE5431, 5PE5458, 5PE5467, and 5PE5483 are **eligible** for the National Register of Historic Places (NRHP).

We concur with your determination that a finding of **need data** is appropriate for the following 86 sites: 5PE5395, 5PE5397, 5PE5398, 5PE5399, 5PE5401, 5PE5402, 5PE5403, 5PE5404, 5PE5405, 5PE5407, 5PE5409, 5PE5410, 5PE5415, 5PE5416, 5PE5417, 5PE5418, 5PE5419, 5PE5420, 5PE5421, 5PE5422, 5PE5423, 5PE5424, 5PE5425, 5PE5426, 5PE5427, 5PE5428, 5PE5429, 5PE5430, 5PE5433, 5PE5435, 5PE5437, 5PE5438, 5PE5439, 5PE5442, 5PE5446, 5PE5447, 5PE5449, 5PE5450, 5PE5451, 5PE5452, 5PE5453, 5PE5455, 5PE5460, 5PE5461, 5PE5463, 5PE5464, 5PE5466, 5PE5468, 5PE5469, 5PE5470, 5PE5471, 5PE5472, 5PE5474, 5PE5475, 5PE5476, 5PE5477, 5PE5478, 5PE5479, 5PE5480, 5PE5481, 5PE5484, 5PE5485, 5PE5486, 5PE5487, 5PE5488, 5PE5489, 5PE5491, 5PE5493, 5PE5495, 5PE5496, 5PE5497, 5PE5499, 5PE5502, 5PE5503, 5PE5504, 5PE5505, 5PE5506, 5PE5507, 5PE5508, 5PE5509, 5PE5510, 5PE5511, 5PE5513, 5PE5514, 5PE5515, and 5PE5516.

We concur with your determination that the following sites are **not eligible** for the NRHP: 5PE1770, 5PE5307, 5PE5400, and 5PE5492.

We concur with your determination that sites 5PE5434, 5PE5436, 5PE5473, and 5PE5500 – recorded from the street – are **not eligible** for the NRHP, due to the fact that they have been entirely paved over with asphalt. However, it is possible that unidentified archaeological resources may be discovered beneath the asphalt that currently covers these properties. If this

occurs, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (36 CFR 60.4) in consultation with our office.

Our understanding is that for the historic architectural resources located within potential historic districts, CDOT has deferred making a recommendation regarding whether they are “contributing” or “non-contributing” to the districts until a final right-of-way (ROW) alternative has been selected. Our office recommends that the same process be employed for these historical archaeological resources. As such, we **do not concur** that all vacant urban lots may be considered non-contributing elements of the potentially eligible districts. It remains unknown whether any cultural remains located at these lots may “convey the significant qualities of the districts” by providing information important to history.

It would greatly facilitate our review of this project if you could please provide a table or other documentation (maps may be helpful) that groups these properties according to the potential historic districts within which they are located.

We **do not concur** with your determination that 5PE5305 (Chencho/Chehcho Shrine) is not eligible for the NRHP. Our office recommends that additional historic archival and/or ethnographic research be conducted to determine the origin of this site, and/or the original or present use of this site. Our office recommends that a finding of **need data** is appropriate for this site until additional research can be completed.

We **do not concur** with your determination that the following 27 sites are not eligible for the NRHP: 5PE5088, 5PE5396, 5PE5406, 5PE5411, 5PE5412, 5PE5413, 5PE5414, 5PE5432, 5PE5440, 5PE5441, 5PE5443, 5PE5444, 5PE5445, 5PE5448, 5PE5454, 5PE5456, 5PE5457, 5PE5459, 5PE5462, 5PE5465, 5PE5482, 5PE5490, 5PE5494, 5PE5498, 5PE5501, 5PE5512, and 5PE5581. These sites were not intensively inventoried, but rather “observed from the perimeter of the site.” Our office recommends that a finding of **need data** is appropriate for these sites until adequate inventory can be completed.

Our office recognizes the difficulty in obtaining private property access in an urban environment, especially for a project of this magnitude. In addition, as discussed in Section 3.6.2 of the inventory report, our office acknowledges the efforts that were made to assess archaeological potential for all vacant lots. However, in light of the results obtained from those sites that *were* intensively inventoried and/or tested, we feel that the “system [that] was developed to forecast the locations of intact cultural deposits” may not have been adequate. The system to which we refer is discussed in Section 3.6.2, on page 3-7 of the inventory report:

“The system includes three levels of potential for archaeological remains: good, fair, and low. Good potential was assigned to those sites that had visible evidence of artifacts or features as observed from the off-site viewing point, as well as evidence of previous use on the Sanborn Fire Insurance maps and/or in the city directories. Sites determined to be of fair potential had no visual evidence of cultural materials or features, but did have indicators of previous occupancy from archival sources or had visual evidence of archaeological deposits and no archival documentation. Sites with

low potential had neither the observable evidence on the ground nor archival evidence of previous occupation. Sites with low potential for archaeological deposits have been recommended as not eligible for the NRHP...”

Our concern is that of the eight sites that were test excavated, five were determined to be eligible for the NRHP. This indicates the possibility that intensive inventory and/or testing may be likely to reveal (buried) cultural deposits, which may render a seemingly vacant lot eligible for the NRHP under criterion D, and possibly under criteria A or B. These potential deposits may not always be depicted on the Sanborn Fire Insurance maps or in the city directories (e.g., middens), but still be able to yield information important in history or prehistory.

Additionally, we observe that the historical archaeological survey was limited to vacant lots and open lands, not including yards surrounding standing structures.

Our office suggests that CDOT consider a “Phased identification and evaluation” approach per 36 CFR 800.4(b)(2) which states,

“Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the agency official may use a phased process to conduct identification and evaluation efforts. ... The process should establish the likely presence of historic properties within the area of potential effects for each alternative or inaccessible area through background research, consultation and an appropriate level of field investigation, taking into account the number of alternatives under consideration, the magnitude of the undertaking and its likely effects, and the views of the SHPO/THPO and any other consulting parties. As specific aspects or locations of an alternative are refined or access is gained, the agency official shall proceed with the identification and evaluation of historic properties in accordance with paragraphs (b)(1) and (c) of this section.”

While we acknowledge that this identification effort began years ago, and proceeded in several stages as described in the report, it is not complete at this time. We look forward to additional consultation regarding future identification and evaluation of historical archaeological properties within the area of potential effects.

Thank you for the opportunity to comment. We look forward to receiving responses to the above comments and to additional consultation for the proposed project. If we may be of further assistance please contact Shina duVall, Section 106 Compliance Manager, at (303) 866-4674 or shina.duvall@chs.state.co.us.

Sincerely,



 Edward C. Nichols
State Historic Preservation Officer
ECN/SAD

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



February 18, 2009

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

Subject: Revised Determinations of Eligibility for Five Archaeological Sites, Project IM 0251-156, New Pueblo Freeway EIS, Pueblo County (CHS #43967)

Dear Mr. Nichols:

In correspondence dated December 5, 2008, you commented on Determinations of Eligibility for 127 historic archaeological sites located within the Area of Potential Effects for the project referenced above. Subsequent to that date additional information was obtained for four sites that affect their National Register eligibility recommendations; one additional site determined to *need data* as noted in your letter was actually subjected to test excavations in 2005 and recommended by CDOT in our November 13, 2008 submittal to be *not eligible*.

Based on supplementary field investigations, archival research, and information provided by local informants as facilitated by Wade Broadhead at the City of Pueblo, we have determined that sites SPE5305, SPE5406, SPE5433 and SPE5475 are *not eligible* for the National Register of Historic Places (NRHP). Site SPE5457 was previously recommended *not eligible* based on test excavations. Information specific to each site is outlined below, and re-evaluation forms for four sites are enclosed for your review.

SPE5305: This site was initially characterized in 2003 as a “historic shrine” but it is in fact a modern memorial and “peace park” erected in memory of a young Pueblo resident who died in 2001. The site lacks archaeological integrity and does not exhibit the potential to contain significant intact buried deposits. While the memorial may be important to members of the local community, the site meets none of the criteria for eligibility for the NRHP nor does it have sufficient historical significance to warrant eligibility under Criteria Consideration F for commemorative properties, or Criteria Consideration G for properties less than fifty years old. Because of the memorial’s potential importance among members of the local Hispanic community, CDOT will evaluate the site in the context of the Socioeconomic and/or Environmental Justice categories during its on-going National Environmental Policy Act (NEPA) analysis.

SPE5406: This was the location of the Centennial High School athletic fields prior to construction of the new Centennial High campus in 1973. The lot was subsequently abandoned and remained undeveloped, although it reportedly occasionally served as the location of a used car lot. Over the last thirty-five years numerous episodes of fill dirt disposal have occurred at this location. After the initial site recordation in 2005, the US Geological Survey constructed an office building and parking lot on the southern portion of the site. The northern portion of the site also experienced widespread and severe disturbance at that time, including earthwork conducted by heavy equipment and the disposal of construction refuse. In addition, a large storm water drainage ditch was constructed which flanks the site on the north and east. (The site

was visited by CDOT Staff Archaeologist in early February 2009.) As a result of the extensive disturbance and the nature of the original use, the site lacks physical integrity and does not have potential for significant intact archaeological deposits. SPE5406 is recommended *not eligible* for the NRHP.

SPE5433: Subsequent to the initial recordation of this site in 2005, the Cambria Hotel was constructed at this location and opened for business in October 2008. The lot is entirely occupied by the hotel, its parking lots, new sidewalks, and landscaping. The entire parcel has been graded or otherwise built on and no evidence remains of historic concrete foundations or any other features noted in 2005. Consequently, the site does not have potential for significant intact archaeological deposits and is recommended as *not eligible*.

SPE5475: The 1922 Sanborn Insurance Co. maps indicate this area was vacant with the exception of a small lumber shed associated with the Newton Lumber Company. It measured roughly 12' by 7' and was likely a simple wood post and shed roof structure. Demolition of the shed and construction of the existing parking lot have destroyed all vestiges of the structure (again, as ascertained by a field visit to the site in February 2009.) There is no potential for significant intact archaeological deposits given the limited function and slight stature of the structure formerly present in this location. SPE5475 is recommended *not eligible* for the NRHP.

SPE5457: Test excavations conducted by WCRM at this site in 2005 revealed extensive disturbance due to multiple episodes of Arkansas River flooding in addition to modern disturbance associated with the Saint Charles Mesa Water District. The survey report notes the completion of testing on p. 3-4, Table 5.3 (p. 5-8) lists the site as *not eligible*, and the site form (a copy of which is in OAHF files) clearly details the results of the test excavations. The site lacks integrity and does not have potential for significant intact archaeological deposits.

The site forms previously submitted provide more detailed information about each of the five sites. We request your concurrence with the determinations of eligibility as outlined above and in the accompanying re-evaluation forms. If you have questions or require additional information in order to complete your review, please contact CDOT Senior Staff Archaeologist Dan Jepson at (303)757-9631, or via Email at daniel.jepson@dot.state.co.us.

Very truly yours,



for Brad Beckham, Manager
Environmental Programs Branch

Enclosures

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



February 18, 2009

Mr. Wade Broadhead
Planning & Community Development
City of Pueblo
211 East D Street
Pueblo, CO 81003

Subject: Revised Determinations of Eligibility for Five Archaeological Sites, Project IM 0251-156,
New Pueblo Freeway EIS, Pueblo County

Dear Mr. Broadhead:

In correspondence dated December 5, 2008, the State Historic Preservation Officer (SHPO) commented on Determinations of Eligibility for 127 historic archaeological sites located within the Area of Potential Effects for the project referenced above. Subsequent to that date additional information was obtained for four sites that affect their National Register eligibility recommendations; one additional site determined to *need data* as noted in the SHPO letter was actually subjected to test excavations in 2005 and recommended by CDOT in our November 2008 submittal to be *not eligible*.

Based on supplementary field investigations, archival research, and information provided by local informants, we have determined that sites 5PE5305, 5PE5406, 5PE5433 and 5PE5475 are *not eligible* for the National Register of Historic Places (NRHP). Site 5PE5457 was previously recommended *not eligible* based on the results of test excavations. Information specific to each site is outlined below, and re-evaluation forms for four sites are enclosed for your information.

5PE5305: This site was initially characterized in 2003 as a "historic shrine" but it is in fact a modern memorial and "peace park" erected in memory of a young Pueblo resident who died in 2001. The site lacks archaeological integrity and does not exhibit the potential to contain significant intact buried deposits. While the memorial may be important to members of the local community, the site meets none of the criteria for eligibility for the NRHP nor does it have sufficient historical significance to warrant eligibility under Criteria Consideration F for commemorative properties, or Criteria Consideration G for properties less than fifty years old. Because of the memorial's potential importance among members of the local Hispanic community, CDOT will evaluate the site in the context of the Socioeconomic and/or Environmental Justice categories during its on-going National Environmental Policy Act (NEPA) analysis.

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was visited by a CDOT Staff Archaeologist in early February 2009.) As a result of the extensive disturbance and the nature of the original use, the site lacks physical integrity and does not have potential for significant intact archaeological deposits. SPE5406 is recommended *not eligible* for the NRHP.

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The accompanying site re-evaluation forms, in addition to the site forms previously submitted, provide more detailed data about each of the sites. This information has been submitted to the SHPO for Section 106 compliance purposes, and is provided to the project consulting parties (via your office) for review and comment. Should you elect to submit comments we request that you do so within 30 days of receipt of this letter.

If you have questions regarding the information provided above or on the enclosures, please contact CDOT Senior Staff Archaeologist Dan Jepson at (303)757-9631, or via Email at daniel.jepson@dot.state.co.us.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures

F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



March 3, 2009

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Additional Eligibility Determinations (Historic Resources), CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Nichols:

This letter and enclosed materials constitute an additional request for concurrence on Eligibility Determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Consultation

We previously consulted with your office regarding the Area of Potential Effects (APE) and survey methodology in a series of meetings in 2002 and 2003, and via correspondence in September 2004. In July 2007 we submitted eligibility determinations for your review and in June 2008 FHWA and CDOT met with your staff and the consulting parties to discuss assorted historic properties issues. In October 2008, we consulted with you and the consulting parties regarding the eligibility of five proposed neighborhood districts within the project APE. This submittal includes the following elements:

- 1) Eligibility determinations for 88 properties that were re-surveyed
- 2) Evaluation of district potential for the Goat Hill Neighborhood
- 3) Revised Architectural Resources Survey Report
- 4) Site forms for three properties that are within the project APE but were not included in the 2007 eligibility determination consultation.
- 5) Management Data Forms for the proposed districts and neighborhoods
- 6) Electronic copy of a spreadsheet of the resurveyed properties for your use during review (sent via email)

Eligibility Determinations

Resurveyed Properties: The 88 properties were initially evaluated in 2005 and submitted to your office with eligibility determinations in 2007. These properties were resurveyed as part of a revised survey methodology that is described in more detail on page 2-3 of the attached survey report. Of the 88 properties, twenty-two are located in the Grove Neighborhood, five are within the proposed Grove historic district boundary, and sixty-five are within the proposed Steelworks Suburbs Neighborhood District (SPE5523). Two of the 88 properties—5PE4710 and 5PE5050—were found to be individually

eligible and are located in the Grove Neighborhood. Please see the enclosed site forms for CDOT's determinations of eligibility for these properties.

As a point of clarification, sixteen of the resurveyed properties were found to be individually not eligible in the 2007 consultation with your office but they are being resubmitted because they are now within the Steelworks Suburb Historic District and we are requesting concurrence on their contributing/non-contributing status. These properties are: 5PE4735, 5PE4739, 5PE4740, 5PE4741, 5PE4742, 5PE4743, 5PE4745, 5PE4752, 5PE4753, 5PE4767, 5PE4768, 5PE4774, 5PE4883, 5PE4890, 5PE4891, and 5PE4892.

Goat Hill Neighborhood (5PE6893)

During the October 2008 consultation regarding the proposed historic districts, your staff asked for more information about the district potential of the Goat Hill neighborhood. CDOT subsequently evaluated Goat Hill, assigned it a separate number, and documented it on a management data form. The survey report was also revised to include historical background information about Goat Hill. Additional historical research was conducted, a boundary was established for the Goat Hill neighborhood, and a reconnaissance-level field survey (including updated photographs of every residential property within the Goat Hill neighborhood boundary) was completed. Per the revised survey methodology for this project, the properties within the Goat Hill neighborhood are being *treated* as eligible for the purposes of Section 106; however, it is CDOT's assertion that these properties can be treated as individually eligible as part of this methodology, but that the overall neighborhood can still lack district potential. Based on the additional research and field survey, it was determined that the Goat Hill neighborhood may have significance but lacks integrity, and does not have historic district potential. Please see the enclosed management data form and the survey report for more information about the analysis of the Goat Hill neighborhood.

Additional Properties

This submittal also includes two newly-recorded resources that were not included in the 2007 eligibility consultation: the Colorado Fuel & Iron Plant Site (5PE5138) and a segment of the Colorado & Wyoming Railroad (5PE5139). The Santa Fe Avenue Bridge (5PE3938), which was evaluated as eligible in the 2000 Statewide Historic Bridge Inventory, is also within the project APE. We have included a copy of the bridge site form for your convenience, but are not requesting your concurrence since the resource has already been determined officially eligible.

We have sent this information to the City of Pueblo Planning Office and will provide a copy of their response once we receive it. As you know, the City of Pueblo has agreed to facilitate the review of these materials with the other Section 106 consulting parties for this project.

We request your concurrence with the determinations of eligibility provided in the submitted materials. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible to discuss a reasonable review period. If you require additional information, please contact Ms. Schoch.

Very truly yours,



for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Revised Architectural Resources Survey Report
Appendix A: Management Data Forms for Proposed Historic Districts
Appendix B: Site forms, maps and tables of Resurveyed properties
Appendix C: Site forms, maps and tables of Combined 2005 and 2008 Survey results

cc: David Miller, CDOT Region 2 Eng. (w/o enclosures)
Dick Annand/Judy DeHaven, CDOT Region 2 Env. (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



March 4, 2009

Mr. Wade Broadhead
Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 East D. Street
Pueblo, CO 81003

SUBJECT: Additional Eligibility Determinations (Historic Resources), CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Broadhead:

This letter and enclosed materials constitute an additional request for comments on Eligibility Determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Consultation

We previously consulted with you regarding the Area of Potential Effects (APE) and survey methodology in a series of meetings in 2002 and 2003. In July 2007 we submitted eligibility determinations and in June 2008 FHWA and CDOT met with SHPO staff and the consulting parties to discuss assorted historic properties issues. In October 2008, we consulted with SHPO and the consulting parties regarding the eligibility of five proposed neighborhood districts within the project APE. This letter includes the following elements:

- 1) Responses to your November 2008 letter
- 2) Eligibility determinations for 88 properties that were re-surveyed
- 3) Evaluation of district potential for the Goat Hill Neighborhood
- 4) Revised Architectural Resources Survey Report
- 5) Site forms for three properties that are within the project APE but were not included in the 2007 eligibility determination consultation.
- 6) Management Data Forms for the proposed districts and neighborhoods
- 7) Electronic copy of a spreadsheet of the resurveyed properties for your use during review (sent via email)

Responses to Comments

Below we address comments and suggestions from your November 2008 letter regarding Goat Hill, the Steelworks Suburb, the Blocks, and the Grove.

Goat Hill: Per your request, CDOT conducted additional research and field survey, and documented the Goat Hill neighborhood on a separate management data form. Please see the discussion of eligibility determinations below for more information.

Steelworks Suburb: We appreciate the suggestions and additional information regarding the architecture, ethnic background, integrity, and proposed boundary of the Steelworks Suburb district. Your primary concern is that the district boundary is too large to “convey a unified period or history” and you suggested that the district should be divided into at least two or three smaller districts, with separate boundaries for the Bessemer and East Mesa neighborhoods. We believe that the current boundary is appropriate both in its ability to encompass the elements of the district, and for Section 106 compliance purposes. Based on 36 CFR 800.4, we have made a reasonable and good faith effort to research and define the Steelworks Suburb district and have no plans to revise the boundary at this time. We have provided your office with a strong foundation for additional research and field survey that might result in changes to this proposed boundary in the future. In addition, revising the boundary will not alter the status of the Steel Mill and its associated neighborhoods as identified historic properties that will be evaluated under Section 106 for project-related effects.

With regard to your question about the status of the steel mill, it is currently owned by Evraz Group S.A., a Russian conglomerate registered in Luxembourg. The company has been removing buildings associated with coke production that were just off the main entrance from Indiana Avenue. CDOT does not have any plans at this time to re-evaluate the property’s significance, and for the purposes of this project, still finds that it is an important part of the Steelworks Suburb historic district.

Blocks

At your suggestion, CDOT changed the Blocks neighborhood name to “Corona Park” in both the site form and the survey report.

Grove

We did not revise the Grove Neighborhood historic district site form to include information about the Alpha Beta packing plant, but recognize that it likely has an historic association with that neighborhood. The plant is not within the project Area of Potential Effects and was not documented during the historic architectural survey.

Eligibility Determinations

Resurveyed Properties: The 88 properties were initially evaluated in 2005 and submitted to the consulting parties with eligibility determinations in 2007. These properties were resurveyed as part of a revised survey methodology that is described in more detail on page 2-3 of the attached survey report. Of the 88 properties, twenty-two are located in the Grove Neighborhood, five are within the proposed Grove historic district boundary, and sixty-five are within the proposed Steelworks Suburbs Neighborhood District (5PE5523). Two of the 88 properties—5PE4710 and 5PE5050—were found to be individually eligible and are located in the Grove Neighborhood. Please see the enclosed site forms for CDOT’s determinations of eligibility for these properties.

As a point of clarification, sixteen of the resurveyed properties were found to be individually not eligible in the 2007 consultation with SHPO but they are being resubmitted because they are now within the Steelworks Suburb Historic District and we are requesting SHPO concurrence on their contributing/non-contributing status. These properties are: 5PE4735, 5PE4739, 5PE4740, 5PE4741, 5PE4742, 5PE4743, 5PE4745, 5PE4752, 5PE4753, 5PE4767, 5PE4768, 5PE4774, 5PE4883, 5PE4890, 5PE4891, and 5PE4892.

Goat Hill Neighborhood (SPE6893)

During the October 2008 consultation regarding the proposed historic districts, SHPO asked for more information about the district potential of the Goat Hill neighborhood. CDOT subsequently evaluated Goat Hill, assigned it a separate number, and documented it on a management data form. The survey report was also revised to include historical background information about Goat Hill. Additional historical research was conducted, a boundary was established for the Goat Hill neighborhood, and a reconnaissance-level field survey (including updated photographs of every residential property within the Goat Hill neighborhood boundary) was completed. Per the revised survey methodology for this project, the properties within the Goat Hill neighborhood are being *treated* as eligible for the purposes of Section 106; however, it is CDOT's assertion that these properties can be treated as individually eligible as part of this methodology, but that the overall neighborhood can still lack district potential. Based on the additional research and field survey, it was determined that the Goat Hill neighborhood may have significance but lacks integrity, and does not have historic district potential. Please see the enclosed management data form and the survey report for more information about the analysis of the Goat Hill neighborhood.

Additional Properties

This submittal also includes two newly-recorded resources that were not included in the 2007 eligibility consultation: the Colorado Fuel & Iron Plant Site (SPE5138) and a segment of the Colorado & Wyoming Railroad (SPE5139). The Santa Fe Avenue Bridge (SPE3938), which was evaluated as eligible in the 2000 Statewide Historic Bridge Inventory, is also within the project APE. We are not requesting SHPO concurrence since the resource has already been determined officially eligible.

As a local preservation organization with an interest in these historic resources, we welcome your comments regarding our determinations of eligibility. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible if you believe you will need additional time.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

- Revised Architectural Resources Survey Report
- Appendix A: Management Data Forms for Proposed Historic Districts
- Appendix B: Site forms, maps and tables of Resurveyed properties
- Appendix C: Site forms, maps and tables of Combined 2005 and 2008 Survey results

cc: David Miller, CDOT Region 2 Eng. (w/o enclosures)
Dick Annand/Judy DeHaven, CDOT Region 2 Env. (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

03-18-09P01:31 RCVD

March 6, 2009

Brad Beckham, Manager
Environmental Programs Branch
Department of Transportation
4201 E. Arkansas Avenue
Shumate Building
Denver, Colorado 80222

Re: Revised Determinations of Eligibility for Five Archaeological Sites, CDOT Project IM 0251-156, New Pueblo Freeway EIS, Pueblo County (CHS #43967)

Dear Mr. Beckham,

Thank you for your correspondence dated February 18, 2009 (received by our office on February 20, 2009) regarding the subject project.

Following our review of the additional information provided, we concur with your determination that the following sites are **not eligible** for the National Register of Historic Places (NRHP): 5PE5305, 5PE5406, 5PE5433, 5PE5457, and 5PE5475.

Thank you for the opportunity to comment. We look forward to additional consultation for the proposed project. If we may be of further assistance please contact Shina duVall, Section 106 Compliance Manager, at (303) 866-4674 or shina.duvall@chs.state.co.us.

Sincerely,



 Edward C. Nichols
State Historic Preservation Officer
ECN/SAD

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 13, 2009

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Additional Information, Colorado Fuel & Iron Plant Site (SPE5138), CDOT Project IM 0251-156, I-25, New Pueblo Freeway Environmental Impact Statement

Dear Mr. Nichols:

On March 3, 2009, CDOT submitted for your review additional eligibility determinations for the Environmental Impact Statement (EIS) referenced above. Among the materials submitted was the site form for the Colorado Fuel & Iron Plant Site (SPE5138). The plant is a contributing feature of the larger Steelworks Suburb Historic District (SPE5523), which your staff agreed is potentially eligible for the National Register of Historic Places. The district's period of significance is from 1881 to 1945, whereas the period of significance for the individual plant extends from its construction in 1880 to 1959, when the plant's growth reached its zenith and began to decline. Because the neighborhoods in the Steelworks Suburb are so closely tied to the history of the plant, and the periods of significance for the district and the plant overlap, CDOT has determined that the plant should be evaluated as a contributing element of the proposed district and not as an individually eligible resource, and that the period of significance for the overall Steelworks Suburb district should be expanded to include the years from 1880 to 1959. CDOT proposes to retire the individual site number for the plant, and asks that you attach the individual site form for the plant to the site form for the Steelworks Suburb district (SPE5523) for informational purposes.

We request your concurrence with the eligibility determination for the Colorado Fuel & Iron Plant site. We have sent this information to the City of Pueblo Planning Office; we will provide a copy of the City's response to you when received.

Thank you in advance for your prompt attention to this matter. Because this information has a bearing on the ongoing review of 88 additional eligibility determinations presently in your possession, we are requesting your comments on or before the extended review deadline of May 1, 2009. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

cc: David Miller, CDOT Region 2
Dick Annand/Judy DeHaven, CDOT Region 2 Env.
Chris Horn, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 13, 2009

Mr. Wade Broadhead
Historic Preservation Commission
Dept. of Community Development
City of Pueblo
211 East D. Street
Pueblo, CO 81003

SUBJECT: Additional Information, Colorado Fuel & Iron Plant Site (SPE5138), CDOT Project IM 0251-156, I-25, New Pueblo Freeway Environmental Impact Statement

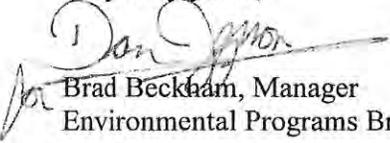
Dear Mr. Broadhead:

On March 4, 2009, CDOT submitted for your review additional eligibility determinations for the Environmental Impact Statement (EIS) referenced above. Among the materials submitted was the site form for the Colorado Fuel & Iron Plant Site (SPE5138). The plant is a contributing feature of the larger Steelworks Suburb Historic District (SPE5523), which your staff agreed is potentially eligible for the National Register of Historic Places. The district's period of significance is from 1881 to 1945, whereas the period of significance for the individual plant extends from its construction in 1880 to 1959, when the plant's growth reached its zenith and began to decline. Because the neighborhoods in the Steelworks Suburb are so closely tied to the history of the plant, and the periods of significance for the district and the plant overlap, CDOT has determined that the plant should be evaluated as a contributing element of the proposed district and not as an individually eligible resource, and that the period of significance for the overall Steelworks Suburb district should be expanded to include the years from 1880 to 1959. CDOT proposes to retire the individual site number for the plant, and asks that you attach the individual site form for the plant to the site form for the Steelworks Suburb district (SPE5523) for informational purposes.

We request your comments on the eligibility determination for the Colorado Fuel & Iron Plant site. We have sent this information to the State Historic Preservation Officer (SHPO) for compliance purposes.

Thank you in advance for your prompt attention to this matter. Because this information has a bearing on the ongoing review of 88 additional eligibility determinations presently in your possession, we are requesting your comments on or before the extended review deadline of May 8, 2009. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,


Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

cc: David Miller, CDOT Region 2
Dick Annand/Judy DeHaven, CDOT Region 2 Env.
Chris Horn, FHWA



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

April 15, 2009

Brad Beckham
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Additional Eligibility Determinations, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Mr. Beckham,

Thank you for your correspondence dated March 3, 2009 and received by our office on March 5, 2009 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we concur with the recommended determinations of National Register eligibility for the surveyed properties. We concur that Colorado Fuel & Iron Plant Site/5PE.5138 should be included as a contributing element within the National Register-eligible Steelworks Suburb Historic District/5PE.5523.

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Coordinator, at (303) 866-4678.

Sincerely,

Edward C. Nichols
State Historic Preservation Officer

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



August 7, 2009

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Additional Eligibility Determinations (Historic Resources), CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Nichols:

This letter and the enclosed materials constitute a request for concurrence on additional eligibility determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts of proposed capacity improvements along an eight-mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Consultation

CDOT has been in consultation with your office and the consulting parties since 2004. Our most recent submittal in March 2009 included the revised Architectural Resources Survey Report and eligibility determinations for re-surveyed properties and districts. This submittal contains the following items:

- 1) Revised Area of Potential Effects (APE) map showing changes to the boundary
- 2) Eligibility determinations and associated architectural inventory forms for 10 newly-recorded properties
- 3) Re-evaluation forms for three previously-recorded properties
- 4) Response to City of Pueblo comments regarding eligibility of King Taco (5PE4958)

Area of Potential Effects Revisions

In April 2009, CDOT met with Amy Pallante of your staff to discuss new information about impacts to properties outside the existing APE boundary and to propose a methodology for how to assess those properties as part of the Section 106 process. During the meeting Ms. Pallante was in agreement with the APE changes and the proposed approach to identification of resources. The enclosed map reflects what was agreed upon at that meeting. A copy of the meeting minutes has also been included for your convenience.

Eligibility Determinations

Newly Documented Properties: Eight of the ten newly-documented properties were identified when it was determined that there were additional impacts outside the APE boundary. Of these, seven properties are within the boundary of the proposed Steelworks Suburb Historic District (SPE5523): SPE6919, SPE6920, SPE6921, SPE6922, SPE6923, SPE6924, and SPE6925, and are evaluated as non-contributing features of that district. There are three newly-recorded properties that are not within districts. The

Speken Wrecking Company (SPE6918) and Wagner Rents building (SPE6936) are assessed as *not eligible*, and the former Newton Lumber Company (SPE5042) is evaluated as *eligible*.

Re-Evaluated Properties: Three properties that were documented during the initial 2003 field survey for this project have subsequently been demolished: SPE4517, SPE4519, and SPE4525. We have re-evaluated these properties and determined that they are *not eligible*. Please see the site forms and updated photos for more information about these properties.

King Taco (SPE4958): During our March 2009 consultation we received comments from the Pueblo Historic Preservation Commission regarding the eligibility of King Taco, a 19th century commercial building located in the Steelworks Suburb potential historic district (SPE5523). The Commission believes that despite modifications, the building still conveys the character-defining elements of its architectural style. The primary alterations have been to the building fenestration. Many of the windows have been replaced with incompatible modern windows and the original window openings have been altered, boarded, or brick-filled. On the second story, there are instances where part of the original window opening has been boarded or bricked, and a small sliding window with metal frame has been inserted into the remaining opening. The central corner entrance is recessed but has a new door and one of the windows flanking the entrance door has been boarded. In addition, the display windows on the lower story have been replaced and the associated transoms boarded or replaced with modern windows. A large window that once extended above the corner entrance was removed and bricked. CDOT has reviewed this property again and continues to support its original assessment that due to modifications to some of the defining characteristics of this corner commercial building, the property is not individually eligible. However, we do believe the property is a contributing element to the Steelworks Suburb potential historic district (SPE5523).

We have sent this information to the City of Pueblo Historic Preservation Commission and will provide a copy of their response once we receive it. As you know, the City of Pueblo has agreed to facilitate the review of these materials with the other Section 106 consulting parties for this project.

We request your concurrence with these determinations of eligibility and your comments regarding the revised APE boundary. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 with any questions or concerns.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Architectural Inventory Forms for 13 properties
Meeting Minutes, April 30, 2009
Revised APE map

cc: David Miller, CDOT Region 2 Eng. (w/o enclosures)
Dick Annand/Judy DeHaven, CDOT Region 2 Env. (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



August 11, 2009

Mr. Wade Broadhead, Planner/HPC Staffer
Department of Planning & Community Development
City of Pueblo
211 East D Street
Pueblo, CO 81003

SUBJECT: Additional Eligibility Determinations (Historic Resources), CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement

Dear Mr. Broadhead:

This letter and the enclosed materials constitute a request for comments on additional eligibility determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts of proposed capacity improvements along an eight-mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Consultation

CDOT has been in consultation with your office since 2004 regarding this project. Our most recent submittal in March 2009 included the revised Architectural Resources Survey Report and eligibility determinations for re-surveyed properties and districts. This submittal contains the following items:

- 1) Revised Area of Potential Effects (APE) map showing changes to the boundary
- 2) Eligibility determinations and associated architectural inventory forms for 10 newly-recorded properties
- 3) Re-evaluation forms for three previously-recorded properties
- 4) Response to City of Pueblo comments from May 2009 correspondence

Area of Potential Effects Revisions

Last spring CDOT learned that there were some direct impacts to properties outside the established Area of Potential Effects for the project. These areas include parcels between South Santa Fe and I-25, a row of properties along Currie Avenue in the Steelworks Suburb proposed historic district, and parcels west and east of I-25 just north of the Grove neighborhood. In April 2009, CDOT met with Amy Pallante of the SHPO staff to discuss these changes to the APE boundary and to propose a methodology for how to assess those properties as part of the Section 106 process. During the meeting Ms. Pallante was in agreement with the APE changes and the proposed approach to identification of resources. The enclosed map reflects what was agreed upon at that meeting. A copy of the meeting minutes has also been included for your convenience.

Eligibility Determinations

Newly Documented Properties: Eight of the ten newly-documented properties were identified when it was determined that there were additional impacts outside the APE boundary. Of these, seven properties

are within the boundary of the proposed Steelworks Suburb Historic District (SPE5523): SPE6919, SPE6920, SPE6921, SPE6922, SPE6923, SPE6924, and SPE6925, and are evaluated as non-contributing features of that district. There are three newly-recorded properties that are not within districts: one of these—the Speken Wrecking Company (SPE6918)—was evaluated as part of the APE revision process and was determined *not eligible*. The other two properties were not evaluated as part of the initial field survey, so they were subsequently evaluated and included in this submittal: the Wagner Rents building (SPE6936) is assessed as *not eligible*, and the former Newton Lumber Company (SPE5042) is evaluated as *eligible*.

Re-Evaluated Properties: Three properties that were documented during the initial 2003 field survey for this project have subsequently been demolished: SPE4517, SPE4519, and SPE4525. We have re-evaluated these properties and determined that they are *not eligible*. Please see the site forms and updated photos for more information about these properties.

Response to Comments

In your May 8, 2009 response to CDOT's March 2009 eligibility determinations, you provided comments on both the Architectural Resources Survey Report and select site forms. We appreciate the time and effort taken to review and comment on the submitted materials and also greatly appreciate your perspective on and knowledge of local history. The survey report has gone through at least one major revision and reprinting to address concerns from SHPO and incorporate information from your office about Pueblo's neighborhoods; as such, there are no immediate plans to produce another version of the report. However, we encourage the City of Pueblo Historic Preservation Commission to use the survey report information for the development of future neighborhood surveys and research projects.

With regard to the individual site forms, we noted that many of your comments addressed the information provided in site form Items 21 (Architectural Style), 35 (Historical Background), 42 (Statement of Significance) and 45 (District Potential). There are many comments that suggest different architectural styles or forms for Item 21, or that request more historical research on specific properties (Item 35). CDOT has no plans to conduct additional research on the individual properties that were resurveyed and submitted to you in March 2009. Sufficient research was conducted to determine whether the resurveyed properties are individually eligible or contributing features of a district, and we have also received SHPO concurrence on those findings. Nevertheless, several of your comments were specific to eligibility, so we have responded to those below. With the exception of the King Taco property, your original comment is followed by CDOT's response.

King Taco (SPE4958): During our March 2009 consultation we received comments from your organization regarding the eligibility of King Taco, a 19th century commercial building located in the Steelworks Suburb potential historic district (SPE5523). You indicated that despite modifications, the building still conveys the character-defining elements of its architectural style, as the primary alterations have been to the building fenestration. Many of the windows have been replaced with incompatible modern windows and the original window openings have been altered, boarded, or brick-filled. On the second story, there are instances where part of the original window opening has been boarded or bricked, and a small sliding window with metal frame has been inserted into the remaining opening. The central corner entrance is recessed but has a new door and one of the windows flanking the entrance door has been boarded. In addition, the display windows on the lower story have been replaced and the associated transoms boarded or replaced with modern windows. A large window that once extended above the corner entrance was removed and bricked. CDOT has reviewed this property again and continues to support its original assessment that due to modifications to some of the defining characteristics of this corner commercial building, the property is not individually eligible to the National Register of Historic

Places (NRHP). However, we do believe the property is a contributing element to the Steelworks Suburb potential historic district (SPE5523).

City of Pueblo: SPE4740 - Non-contributing, cottage.

CDOT Response: The property is currently identified as a contributing element of the Steelworks Suburb Historic District (SPE5523). Please clarify whether you think the property should be non-contributing.

City of Pueblo: SPE5211 - Great integrity, craftsman

CDOT Response: All properties within proposed districts were evaluated for contributing or non-contributing status. The Steelworks Suburb potential historic district (SPE5523) is significant under Criterion C for its examples of architecture, including Craftsman style bungalows. Because this house was built within the period of significance for the district and it conveys the architectural significance of the district, it was evaluated as individually not eligible, but as a contributing element of the district.

City of Pueblo: SPE5227 - Pursued nomination, early five and dime store/grocery/mercantile at important Indiana Gate entrance to CF&I

CDOT Response: Although this property was evaluated as individually not eligible, it was found to be a contributing element of the Steelworks Suburb historic district. It was built within the period of significance for the district, and based on research it appears to have served CF&I plant employees as well as residents in the nearby neighborhoods. Its history is tied to the steel mill and neighborhoods within the district.

City of Pueblo: SPE5241 - Important bar at the entrance to Indiana Gate. Modification in 1940, during boom period. 1945-1960 highest point of CF and I operation.

CDOT Response: Like SPE5227, this property was found to be a contributing element to the Steelworks Suburb historic district. It was built within the district period of significance and given the additional information your office provided, it likely has an association with the steel workers and the surrounding neighborhoods.

City of Pueblo: SPE4701 - bad pictures and information overall

CDOT Response: Attached are additional photos of the house. As you can see, vegetation and fencing have obstructed every possible view of the building. The house is located in the Grove neighborhood, outside of the established boundary identified for the Grove historic district (SPE5519). Based on the site visit, the house does not have the associations with events or individuals to be significant under Criteria A or B. Under Criterion C, it is a simple wood frame building—possibly a shotgun house—that does not appear to be a good example of this architectural type due to minor modifications including the application of vinyl siding.

City of Pueblo: SPE4712 - Roof form and divided light windows looks earlier than 1948.

CDOT Response: We agree that the divided light windows probably pre-date 1948, but this is the date provided by the Pueblo County Assessor material and was probably an adjustment to account for the 1996 remodel date. Regardless of its actual year of construction, CDOT still maintains that the property is not a good example of a simple wood frame or even Minimal Traditional house due to incompatible modifications to the windows.

As a consulting party for this project, we welcome your comments on the additional determinations of eligibility and the revised APE boundary. With past submittals for this project, your office has acted as the main contact and has facilitated reviews with the other consulting parties; we trust that you will continue to serve in that capacity. A second copy of the site forms and other materials is included

herewith to assist in this process. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 with any questions or concerns.

Very truly yours,



for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Architectural Inventory Forms for 13 properties (2 sets)
Meeting Minutes, April 30, 2009 (2 copies)
Revised APE map (2 copies)
Additional photos for 5PE4701 (2 sets)

cc: David Miller, CDOT Region 2 Eng. (w/o enclosures)
Dick Annand/Judy DeHaven, CDOT Region 2 Env. (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)
Edward Nichols, Colorado SHPO (w/o enclosures)



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

August 26, 2009

Brad Beckham
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Additional Eligibility Determinations, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Mr. Beckham,

Thank you for your correspondence dated August 7, 2009 and received by our office on August 12, 2009 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we concur with the recommended findings of eligibility for the properties listed below.

- 5PE.5042
- 5PE.6936
- 5PE.4517
- 5PE.4519
- 5PE.4525
- 5PE.6918
- 5PE.6919
- 5PE.6920
- 5PE.6921
- 5PE.6922
- 5PE.6923
- 5PE.6924
- 5PE.6925

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CRF 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,

Edward C. Nichols
State Historic Preservation Officer

F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 1, 2010

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Effects Determinations, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Mr. Nichols:

This letter and enclosed report constitute a request for concurrence on Effects Determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Consultation

Section 106 consultation for this project has been ongoing since 2002. We consulted with your office regarding the Area of Potential Effects (APE) and survey methodology in a series of meetings in 2002 and 2003, and via correspondence in September 2004. In July 2007 we submitted eligibility determinations for your review, and in June 2008 FHWA and CDOT met with your staff and the consulting parties to discuss assorted historic properties issues. In October 2008, we consulted with you and the consulting parties regarding the eligibility of five proposed neighborhood districts within the project APE. We also consulted with you in March 2009 and in August 2009 regarding eligibility of additional properties.

Effect Determinations

The enclosed Determination of Effects Report includes an analysis of impacts of the No Action Alternative, descriptions of the direct and indirect impacts of the Proposed Build Alternatives, effect determinations of the Build Alternatives on historic properties, and proposed mitigation measures for adverse effects. The report includes effect determinations for 196 properties that were either determined eligible or are being treated as eligible for the purposes of Section 106. This includes five proposed historic districts that have a combined total of 587 contributing properties. Please see the report for more specific information about the effect determinations.

Enclosed for your use is a spreadsheet that lists the properties, summarizes the types of effects by alternative, and includes the effect determination for each Build Alternative. We have enclosed it in hard copy with this submittal, but will also forward it to your office electronically. Please note that the Newton Lumber Company (SPE5042) and the Union Pacific Railroad (SPE1776) are listed in the enclosed table, but effect determinations for these properties (as well as eligibility and effect

determinations for some additional properties not previously documented) will be submitted separately in the near future.

We have also enclosed a copy of the *New Pueblo Freeway Aesthetics Guidelines*, which provides an overview of proposed aesthetic treatments for the project corridor, including a conceptual drawing of the restoration plan for the historic Mineral Palace Park. The Determination of Effects Report references the Aesthetics Guidelines so we have included it for reference and information purposes only. We are not requesting comments on these guidelines.

This submittal has been sent to the City of Pueblo Planning Office and will provide a copy of their response once we receive it. As you know, the City of Pueblo has agreed to facilitate the review of these materials with the other Section 106 consulting parties for this project.

We request your concurrence with the determinations of effects provided in the submitted materials. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible to discuss a reasonable review period. If you require additional information, please contact Ms. Schoch.

Very truly yours,



Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

- Determination of Effects report
- Determination of Effects CD
- Effects Recommendations Response Table
- New Pueblo Freeway Aesthetics Guidelines

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

F

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 1, 2010

Mr. Wade Broadhead
Planner/HPC Staffer
Department of Planning & Community Development
211 East D. Street
Pueblo, CO 81003

SUBJECT: Effects Determinations, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Mr. Broadhead:

This letter and enclosed report constitute a request for comments on Effects Determinations for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). CDOT has been in consultation with your office since 2004. Our most recent submittal in August 2009 included additional eligibility determinations for properties within the Area of Potential Effects (APE).

Effect Determinations

The enclosed Determination of Effects Report includes an analysis of impacts of the No Action Alternative, descriptions of direct and indirect impacts of the Proposed Build Alternatives, effect determinations of the Build Alternatives on historic properties, and proposed mitigation measures for adverse effects. The report includes effect determinations for 196 properties that were either determined eligible or are being treated as eligible for the purposes of Section 106. This includes five proposed historic districts that have a combined total of 587 contributing properties. Please see the report for more specific information about the effect determinations.

Enclosed for your use is a spreadsheet that lists the properties, summarizes the types of effects by alternative, and includes the effect determination for each Build Alternative. We have enclosed it in hard copy with this submittal, but will also forward it to your office electronically. Please note that the Newton Lumber Company (5PE5042) and the Union Pacific Railroad (5PE1776) are listed in the enclosed table, but effect determinations for these properties (as well as eligibility and effect determinations for some additional railroad and other properties not previously documented) will be submitted separately in the near future.

We have also enclosed a copy of the *New Pueblo Freeway Aesthetics Guidelines*, which provides an overview of proposed aesthetic treatments for the project corridor, including a conceptual drawing of the restoration plan for the historic Mineral Palace Park. The Determination of Effects Report references the Aesthetics Guidelines so we have included it for reference and information purposes only. We are not requesting comments on these guidelines.

As a consulting party for this project, we welcome your comments on the additional determinations of eligibility and the revised APE boundary. With past submittals for this project, your office has acted as the main contact and has facilitated reviews with the other consulting parties for this project. We have provided a second copy of the Determination of Effects Report and a CD of the report and other materials to assist in this process. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible to discuss a reasonable review period.

Very truly yours,



Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

- Determination of Effects report (2 copies)
- Determination of Effects CD
- Effects Recommendations Response Table
- New Pueblo Freeway Aesthetics Guidelines

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 16, 2010

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado - The Colorado Historical Society
1560 Broadway, Suite 400
Denver, CO 80202

SUBJECT: Determinations of Effects for Archaeological Sites, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #43967)

Dear Mr. Nichols:

This letter and the enclosed materials constitute a request for concurrence on Determinations of Effects for archaeological sites located within the Area of Potential Effect (APE) of the project referenced above. As you will recall, the EIS will be used to determine the nature and degree of environmental impacts resulting from proposed capacity and safety improvements along an eight-mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard on the south (milepost 94) and 29th Street on the north (milepost 102).

Previous Consultation

Section 106 consultation for the project has been ongoing since 2002. However, the vast majority of that coordination has focused on standing structures and other resources in the historic built environment. All correspondence specific to archaeological surveys and site eligibility determinations was submitted to your office separately beginning in November 2008. Of the 127 historic archaeological localities present in the APE, five sites are officially eligible for the National Register of Historic Places (NRHP), 13 sites are not eligible, and 109 sites require additional data in order to make a final NRHP eligibility assessment. No prehistoric or historic sites affiliated with Native American occupation of the area were documented.

In 2009 we consulted informally with OAHP Compliance Officer Shina DuVall regarding strategies to address the 26 "need data" sites that will be directly impacted by one or both of the proposed Build Alternatives. At this time, however, we intend to defer official consultation for all the need data sites until later in the NEPA documentation process, likely subsequent to selection of a preferred alternative as a result of public comments on the draft EIS. Once a preferred alternative is chosen we will have a definitive idea regarding the number and type of sites for which we will or may need to conduct additional investigations.

Effects Determinations

Three project alternatives are under consideration, including the No Action Alternative and two Build Alternatives referred to as the "Existing" and "Modified." Only two of the NRHP eligible sites (5PE5458, 5PE5483) would be subject to direct impacts and therefore adverse effects, both as a result of implementation of the Modified Alternative. The remaining three NRHP eligible sites (5PE5408, 5PE5431 and 5PE5467) would be avoided by construction regardless of alternative. The No Action and Existing Alternatives would each result in *no historic properties affected*.

If the Modified Alternative is eventually selected as preferred, sites 5PE5458 and 5PE5483 would be adversely affected by earth-moving equipment during construction. As shown on the enclosed aerial photograph of the Modified Alternative (the third page of the enclosed packet), the I-25 mainline and associated northbound on-ramp each bisect portions of 5PE5458 (identified as a blue outline), and cutting and filling activities during construction would likely destroy the entire site.

The Modified Alternative would also directly impact 5PE5483, although in a different manner (refer to the fifth and sixth pages of the packet): the area containing the site would be encompassed by a new location for Benedict Park, a city-owned facility. The park presently exists in a different location and configuration in Pueblo, but the location as illustrated on the attachment is proposed for a newly constructed park. 5PE5483 would likely be destroyed by earth moving associated with construction of the park. Regardless of the type of impact to 5PE5458 and 5PE5483, however, it is our judgment that the sites are significant chiefly because of what can be learned by data recovery and have minimal value for preservation in place.

As noted above, we will consult with you at a later date regarding the disposition of and final eligibility determinations for the 26 "need data" sites that either would or likely would be adversely affected by the project. Nonetheless, the following data specific to the number of need data sites directly impacted by each alternative is provided for your general information: the Existing Alternative would impact 16 sites, and the Modified Alternative would impact 18 sites. Ten sites have impacts common to both Alternatives.

This information has been forwarded to the City of Pueblo Planning Office, a Section 106 consulting party, for review and comment. As you are aware, the City of Pueblo has agreed to facilitate the review of all compliance related materials with the other consulting parties participating in the project. We will provide you with copies of any comments received.

We request your concurrence with the determinations of effects provided herein and as illustrated in the accompanying materials. If you have questions or require additional information to complete your review, please contact CDOT Senior Staff Archaeologist Dan Jepson at (303) 757-9631, or via Email at daniel.jepson@dot.state.co.us.

Very truly yours,



for Brad Beckham, Manager
Environmental Programs Branch

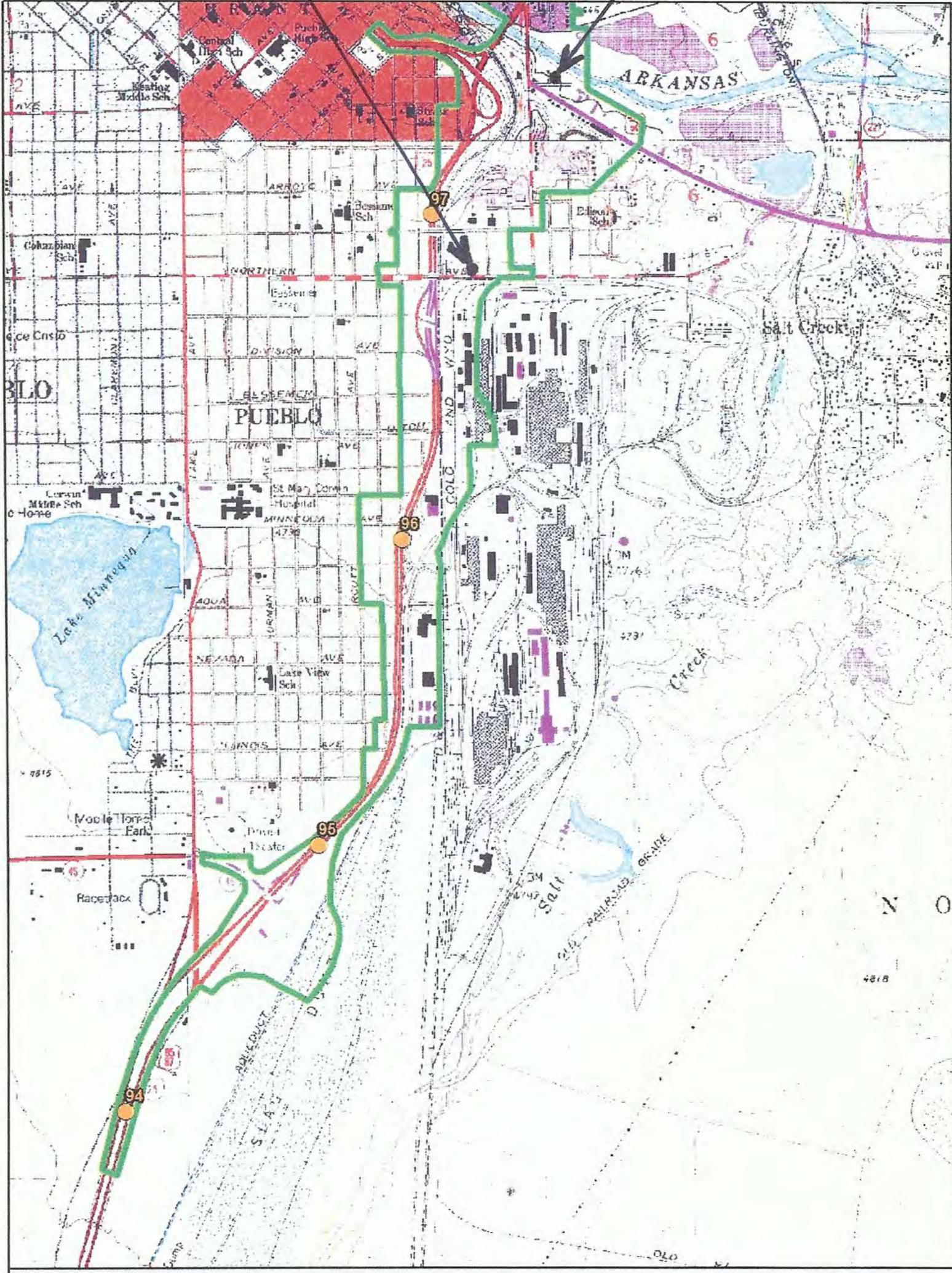
Enclosures:

Aerial photo plan sheets
Benedict Park illustration

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)
Sara Orton, CH2Mhill

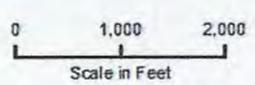
SPES483

SPES458



Quad Name: Southeast Pueblo (1977)
 Southwest Pueblo (1977)
 Principle Meridian: 6th
 T21S R64W / Sec 6, 7
 T21S R65W / Sec 1, 12, 13, 24, 25, 26

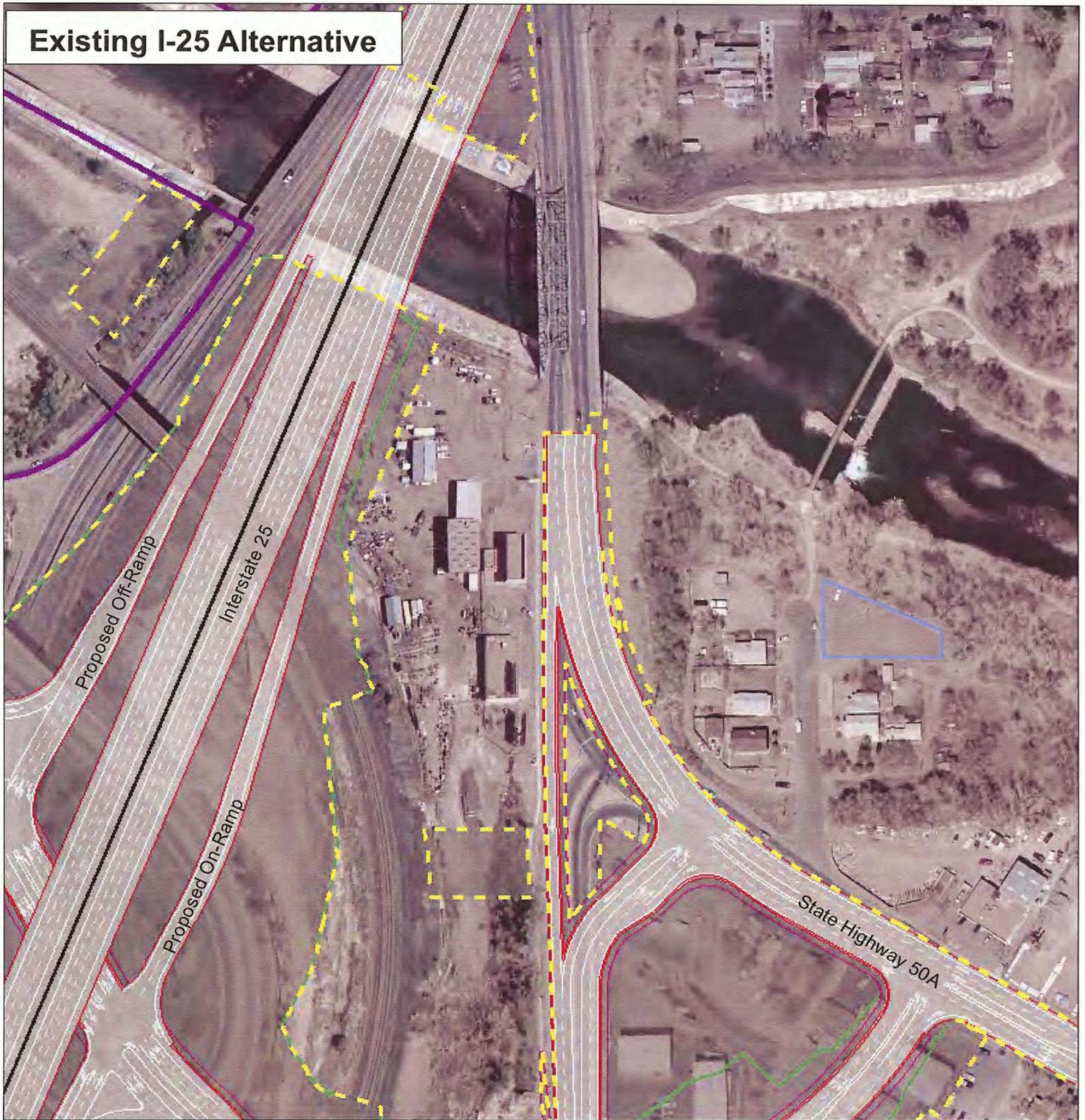
● Milepost Designation
 Project Boundary



South End

**I-25 Pueblo Freeway Improvement Project
 Survey Management Information Form**

Existing I-25 Alternative

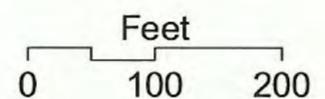


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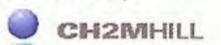
-  Archaeological Sites
-  Proposed Impact Area
-  Toe of Slope
-  Edge of Pavement
-  Proposed Noise Walls
-  Proposed Retaining Walls
-  Sidewalk
-  Historic Districts

5PE5458

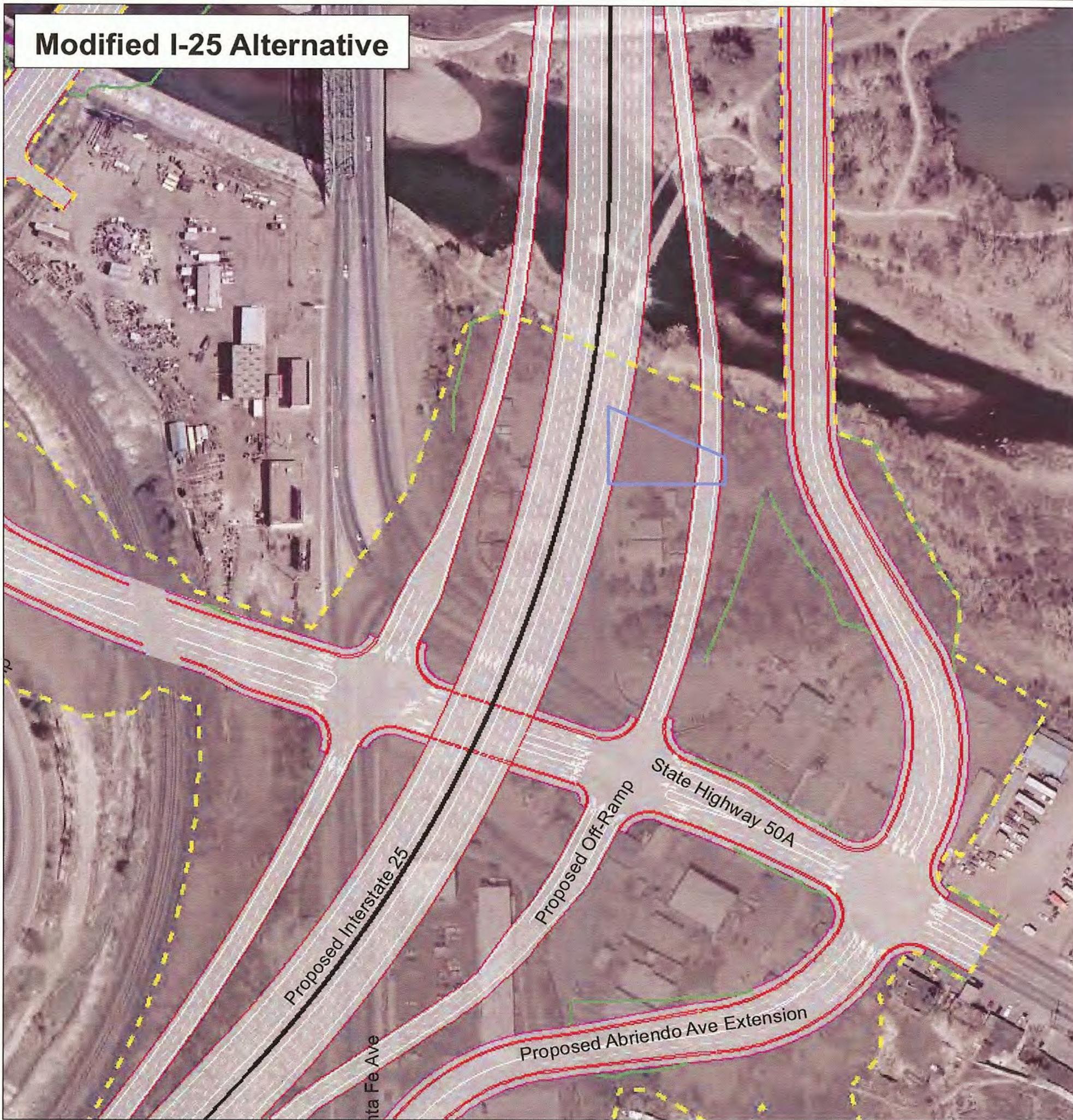
Projection:
Colorado State Plane Grid
South Zone, NAD83
Aerial Photography 2004



Notes:
This is a draft document and
subject to change.
Atlas updated 06/02/2009



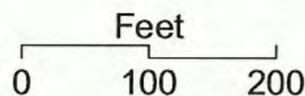
Modified I-25 Alternative



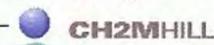
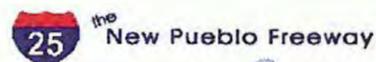
Legend

- Archaeological Sites
- Proposed Impact Area
- Toe of Slope
- Proposed Noise Walls
- Edge of Pavement
- Sidewalk
- Historic Districts

Projection:
Colorado State Plane Grid
South Zone, NAD83
Aerial Photography 2004



Notes:
This is a draft document and
subject to change.
Atlas updated 06/02/2009



5PE5458

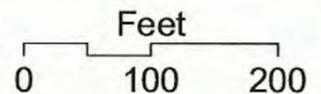
Existing I-25 Alternative



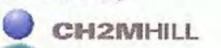
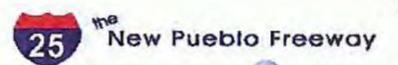
Legend

- Archaeological Sites
- Proposed Impact Area
- Toe of Slope
- Edge of Pavement
- Proposed Noise Walls
- Proposed Retaining Walls
- Sidewalk
- Historic Districts

Projection:
 Colorado State Plane Grid
 South Zone, NAD83
 Aerial Photography 2004

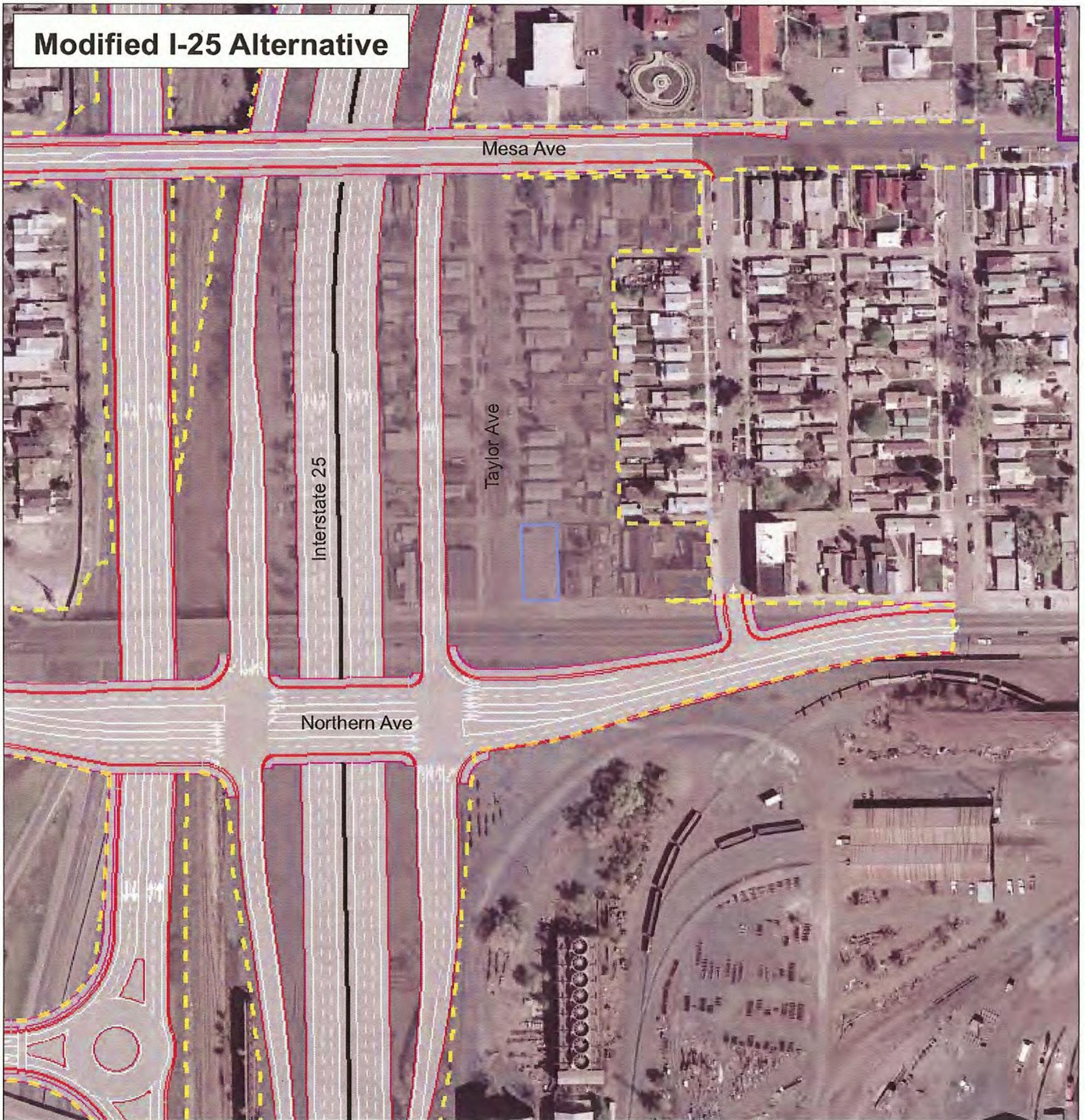


Notes:
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 subject to change.
 Atlas updated 06/02/2009



5PE5483

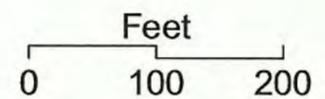
Modified I-25 Alternative



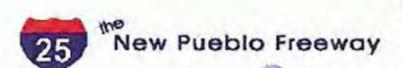
Legend

- Archaeological Sites
- Proposed Impact Area
- Toe of Slope
- Proposed Noise Walls
- Edge of Pavement
- Sidewalk
- Historic Districts

Projection:
Colorado State Plane Grid
South Zone, NAD83
Aerial Photography 2004

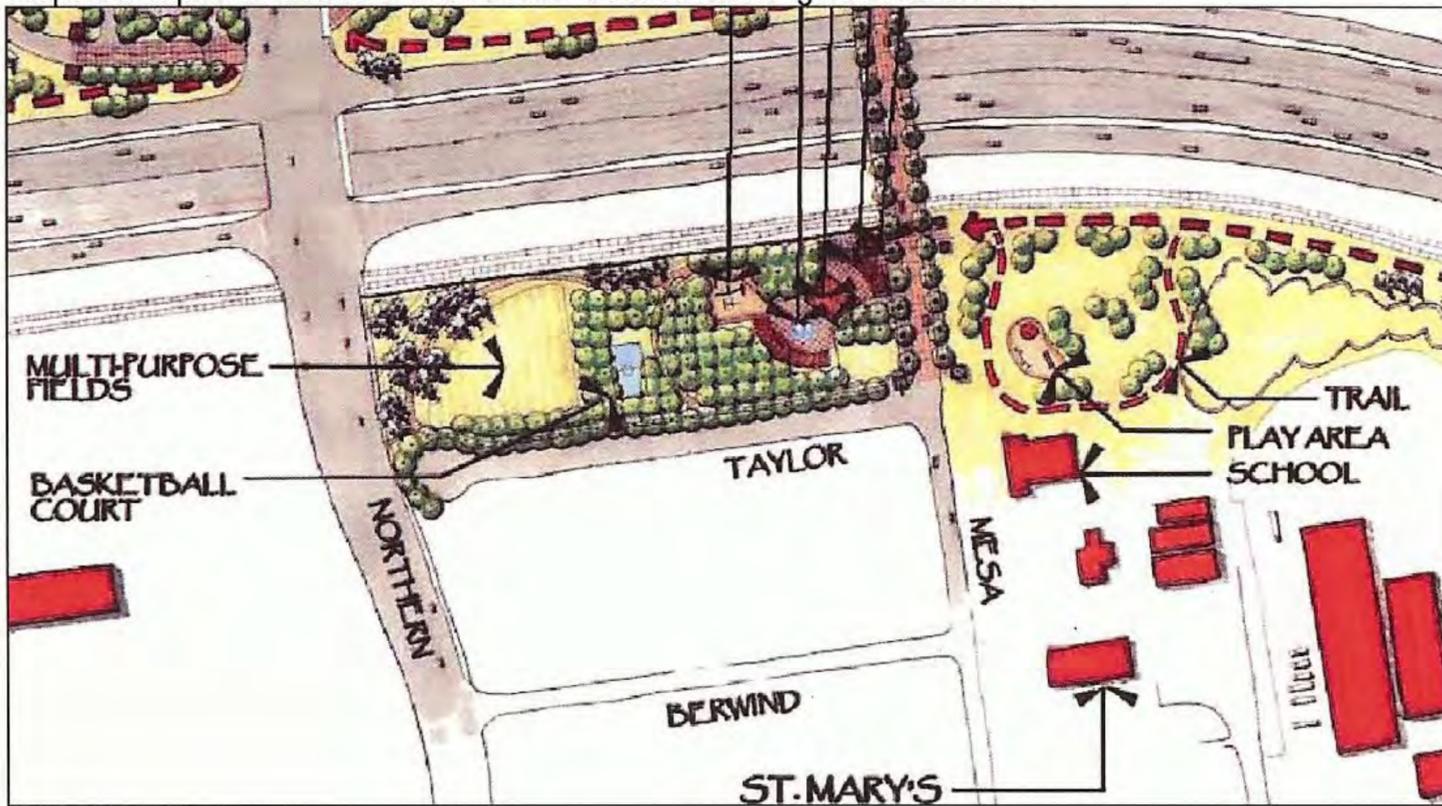


Notes:
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subject to change.
Atlas updated 06/02/2009

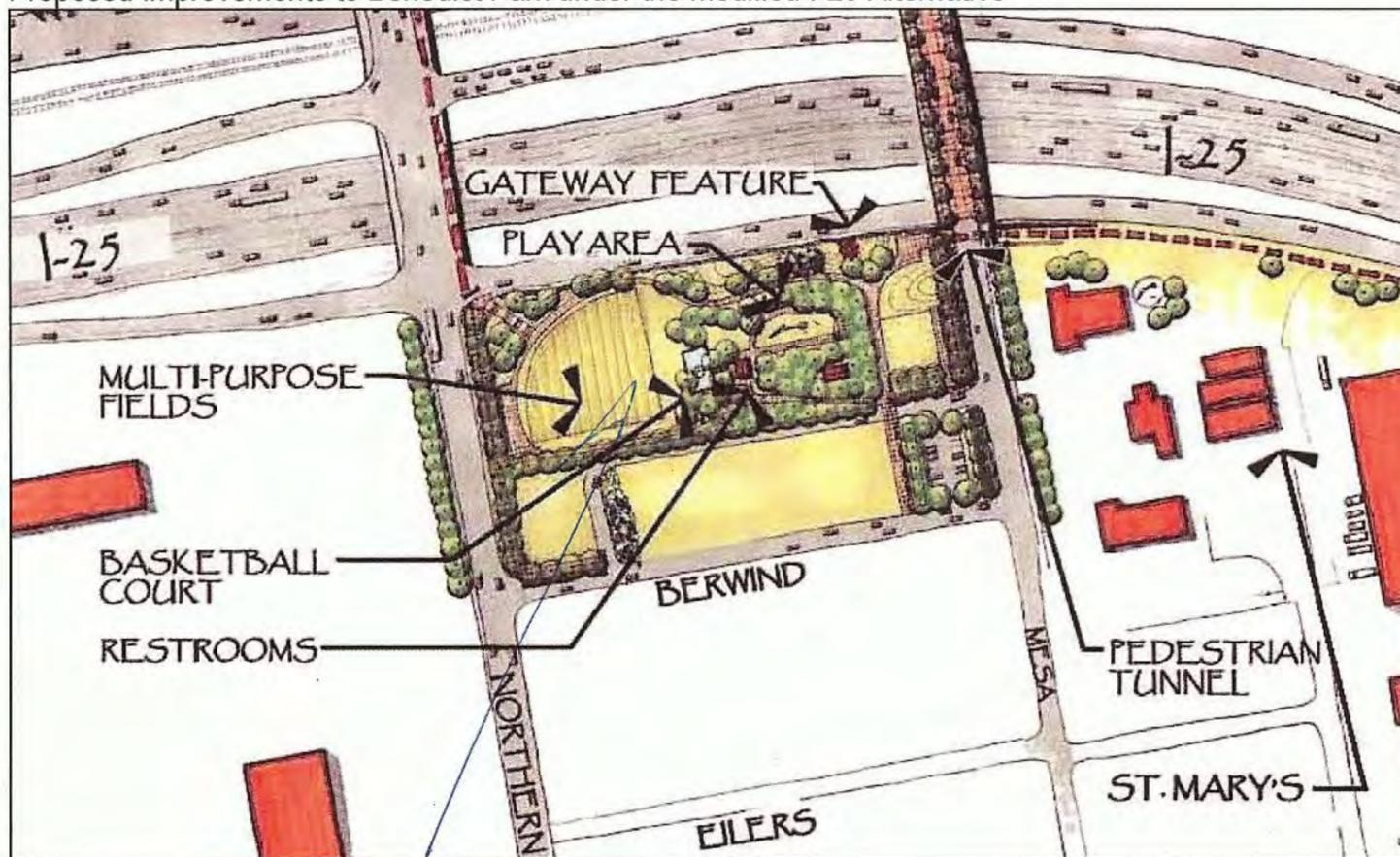


5PE5483

Proposed Improvements to Benedict Park under the Existing I-25 Alternative



Proposed Improvements to Benedict Park under the Modified I-25 Alternative



APPRDx LOCATION OF SPE5743

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



April 16, 2010

Mr. Wade Broadhead
Historic Preservation Commission
City of Pueblo
211 East D Street
Pueblo, CO 81003

SUBJECT: Determinations of Effects for Archaeological Sites, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement

Dear Mr. Broadhead:

This letter and the enclosed materials constitute a request for comments on Determinations of Effects for archaeological sites located within the Area of Potential Effect (APE) of the project referenced above. As you are aware, the EIS will be used to determine the nature and degree of environmental impacts resulting from proposed capacity and safety improvements along an eight-mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard on the south (milepost 94) and 29th Street on the north (milepost 102).

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In 2009 we consulted informally with you as well as representatives of the Office of Archaeology and Historic Preservation regarding strategies to address the 26 "need data" sites that will be directly impacted by one or both of the proposed Build Alternatives. At this time, however, we intend to defer official consultation for all the need data sites until later in the NEPA documentation process, likely subsequent to selection of a preferred alternative as a result of public comments on the draft EIS. Once a preferred alternative is chosen we will have a definitive idea regarding the number and type of sites for which we will or may need to conduct additional investigations.

Effects Determinations

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Mr. Broadhead
April 16, 2010
Page 2

If the Modified Alternative is eventually selected as preferred, sites SPE5458 and SPE5483 would be adversely affected by earth-moving equipment during construction. As shown on the enclosed aerial photograph of the Modified Alternative (the second page of the enclosed packet), the I-25 mainline and associated northbound on-ramp each bisect portions of SPE5458 (identified as a blue outline), and cutting and filling activities during construction would likely destroy the entire site.

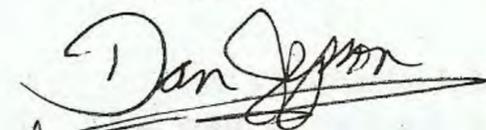
The Modified Alternative would also directly impact SPE5483, although in a different manner (refer to the fourth and fifth pages of the packet): the area containing the site would be encompassed by a new location for Benedict Park, a city-owned facility. The park presently exists in a different location and configuration in Pueblo, but the location as illustrated on the attachment is proposed for a newly constructed park. SPE5483 would likely be destroyed by earth moving associated with construction of the park. Regardless of the type of impact to SPE5458 and SPE5483, however, it is our judgment that the sites are significant chiefly because of what can be learned by data recovery and have minimal value for preservation in place.

As noted above, we will consult with you at a later date regarding the disposition of and final eligibility determinations for the 26 "need data" sites that either would or likely would be adversely affected by the project. Nonetheless, the following data specific to the number of need data sites directly impacted by each alternative is provided for your general information: the Existing Alternative would impact 16 sites, and the Modified Alternative would impact 18 sites. Ten sites have impacts common to both Alternatives.

This information has been forwarded concurrently to the State Historic Preservation Officer for compliance review. As with past reviews for this project, it is our understanding that you will facilitate review of these materials by the other local consulting parties and compile any comments in a single transmittal to CDOT.

Please complete your review and forward any comments to CDOT Senior Staff Archaeologist Dan Jepson within 30 days of receipt of this correspondence. If you have questions about the information contained herein, please contact Mr. Jepson at (303) 757-9631, or via Email at daniel.jepson@dot.state.co.us.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Aerial photo plan sheets
Benedict Park illustration

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)
Sara Orton, CH2Mhill (w/o enclosures)

April 29, 2010

Ms. Lisa Schoch
CDOT
Environmental Programs Branch
4201 East Arkansas Ave.
Denver, CO 80222

Mountains/Plains
OFFICE

Re: I-25 Pueblo Freeway Section 106 Consultation

Dear Lisa:

As a follow-up to email and in-person communication with you, we are writing to seek National Historic Preservation Act Section 106 consulting party status for the I-25 Pueblo Freeway project. The National Trust would like to participate actively in the review process as a “consulting party” under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(6).

The National Trust for Historic Preservation is a private nonprofit organization chartered by Congress in 1949 to promote public participation in the preservation of our nation’s heritage, and to further the historic preservation policy of the United States. See 16 U.S.C. § 468. The Mountains/Plains Office provides technical assistance to eight states, including Colorado. With the strong support of our 250,000 members around the country, including nearly 3,000 members in Colorado, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

We are particularly interested in this project because of its potential to affect the historic buildings and structures associated with the Colorado Fuel and Iron (CF & I) complex which is bisected by the existing alignment of I-25. We have provided a \$5,000 grant to the Bessemer Historical Society for a master plan for the CF & I administrative complex buildings on the west side of the existing corridor. We hope that investment will not be lost in the realignment.

Because of the National Trust’s knowledge and concern about historic properties potentially affected by the project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106.

Mountains/Plains Office

535 16th Street, Suite 750

Denver, CO 80202,

P 303.623.1504

F 303.623.1508.

E mpro@nthp.org

Serving: CO, KS, MT, ND, NE, SD, UT & WY

National Office

1785 Massachusetts Avenue, NW

Washington, DC 20036

P 202.588.6000

F 202.588.6038

E info@nthp.org

www.PreservationNation.org

Please include us in your distribution list for public notices of any meetings, and for the circulation of any documents for comment.

We look forward to participating as the review and consultation process moves forward for the I-25 Pueblo Freeway.

Sincerely,

A handwritten signature in black ink that reads "Amy Cole". The signature is written in a cursive, flowing style.

Amy Cole
Sr. Program Officer &
Regional Attorney

cc: Amy Pallante, CO State Historic Preservation Office
Jim Hare, Colorado Preservation, Inc.
Wade Broadhead, Department of Planning and Community Development,
City of Pueblo



Colorado Preservation, Inc.

333 W. COLFAX AVENUE, SUITE 300 | DENVER, CO 80204 | PHONE 303.893.4260 | FAX 303.893.4333

May 5, 2010

Ms. Lisa Schoch
CDOT
Environmental Programs Branch
4201 E Arkansas Avenue
Denver, CO 80222

RE: Section 106 Consultation for I-25 (Pueblo Freeway Section)

Dear Ms. Schoch:

Please accept this letter as a formal request for Colorado Preservation, Inc. to be granted National Historic Preservation Act Section 106 consulting party status for the I-25 Pueblo Freeway project.

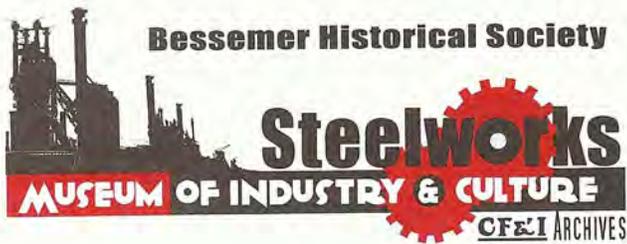
Colorado Preservation, Inc. was formed in 1984 and continues to serve Colorado as the only private, statewide historic preservation advocacy organization. Our preservation programs and initiatives include *Saving Places* which is the largest statewide historic preservation conference in the nation, a cultural resources survey team, a preservation project manager, the Colorado Preserve America Youth Summit, HistoriCorps, and the Colorado's Most Endangered Places Program. These programs are designed to serve urban and rural communities, providing historic preservation education, training, technical support, and advocacy.

The CF&I complex was added to the 1999 Colorado's Most Endangered Places List. While great progress has been made with the rehabilitation and reuse of what now serves as the Steelworks Museum of Industry and Culture, our understanding is that the I-25 project has the potential to adversely impact the historic complex on the east side of the I-25 corridor. These buildings and structures represent a very historically significant industrial landscape, and CPI wishes to provide knowledge and input as a consulting party under Section 106.

Please don't hesitate to call or email with any questions. I look forward to working with CDOT and the other preservation stakeholders on developing alternatives that will not result in adverse impacts on the CF&I complex.

Regards,

Patrick A. Eidman
Endangered Places Program Coordinator



May 10, 2010

(resent 7/23/2010)

Brad Beckham, Manager-Environmental Programs Branch
Colorado Dept. of Transportation
Shumate Building
4201 East Arkansas Avenue
Denver, CO 80222

Re: Review of Section 106 study of I-25 Recommended Changes

Dear Mr. Beckham,

I have reviewed the document, "Determination of Effects to Historic Properties: I-25 New Pueblo Freeway Improvement Project", a Section 106 study, in relationship to the proposed changes to I-25 through the City of Pueblo. The document covers all aspects of the interstate through the city of Pueblo but I found the study rather confusing in trying to follow the different proposals for changes to the interstate. I just reviewed the area around the historic CF&I Office complex and the Evraz Rocky Mountain Steel Mill in the historic area of Bessemer. Many other areas of Pueblo are very important but I only had time to consider the area around the historic steel mill. The other area of great concern is the Mineral Palace Park area and any changes to the historic feel and look of the park that previously was destroyed in the building of I-25 in the 1950's.

It is imperative if and when changes are made to the historic Bessemer neighborhood that the impact is minimal to any historic businesses including Gagliano's, Gus' Place, St. Mary's Church and School, the neighborhood parks and the historic structures of the steel mill and the CF&I administration buildings. The connectivity of neighborhoods also must be considered a top priority which was never considered when the interstate was originally designed and implemented.

The Bessemer Historical Society (BHS) is **strongly opposed** to closing off the historic tunnel under I-25. This tunnel is remembered by many as the place where they either walked under I-25 to get to work or stood and waited for their husband, father or grandfather as they walked through to go home from their shift. The tunnel evokes a very emotional experience for hundreds, if not, thousands of people as it was a time when work was hard and families spend so much time together.

BHS is also **strongly opposed** to the tear down of buildings related to the steel mill. The historic stacks are all that remain of the old blast furnaces. The blast furnace stacks and the buildings represent a time when steel was made from raw materials not from recycling from scrape as it is currently.

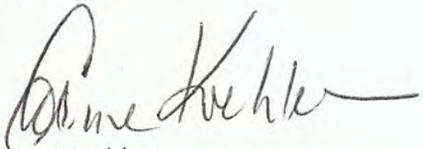
215 Canal Street - Pueblo, CO 81004
(719) 564-9086 - (719) 564-9681 fax
www.cfisteel.org

In the booklet, "New Pueblo Freeway, Aesthetic Guidelines" changes were proposed for the BHS property that does not conform to the BHS master plan and has never been discussed with BHS. The recommendations are not part of the master plan of the Society. Reviewing this study was the first I saw of the shotgun homes and a historic walking tour route on the property. The plans highlight views to the steel mill but in your proposal you are destroying the structures everyone would want to view from the site. On the same schematic the building owned and renovated by Pueblo Electric does not show and it is a very historic structure.

The Bessemer Historical Society appreciates how some of the exits and entrances to I-25 need to be modified but a complete redesign of the interstate is not warranted based on the current usage of the highway.

Thank you for allowing the Bessemer Historical Society, the owner of 5.7 acres of historic properties, located adjacent to the interstate to voice an opinion on the recommended changes.

Sincerely,

A handwritten signature in cursive script, appearing to read "Corinne Koehler". The signature is written in dark ink and is positioned above the typed name.

Corinne Koehler
President of the Board of Directors
Bessemer Historical Society

May 17, 2010

Brad Beckham
Manager
Colorado Department of Transportation
Environmental Planning Branch
4201 East Arkansas Avenue
Denver, CO 80222

RE: Effects Determinations, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Mr. Beckham:

Thank you for your correspondence dated April 1, 2010 and received by our office on April 6, 2010 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106). We concur with the recommended findings of effects except for the properties listed below. We have included the excel spreadsheet as well.

- 5PE.5050. According to the effects report on page 5-51, a finding of no historic properties affected is recommended for the Existing I-25 Alternative, but the effects spreadsheet includes a recommendation of no adverse effect. We concur with the recommendations provided in the effects spreadsheet.
- 5PE.5517. Land from within Mineral Palace Park, a contributing resource to the North Side Historic District, will be required as well mitigation will affect the historic significance of the park. In our opinion, the cumulative effects to a contributing property within the historic district would be an adverse effect, as defined in 36 CFR 800.5(a)(2)(i), 36 CFR 800.5(a)(2)(ii), and 36 CFR 800.(a)(2)(iv).
- 5PE.5519. We concur with the recommended finding of effect for the Existing I-25 Alternative, but we do not concur with the recommended finding for Modified I-25 Alternative. In our opinion, a finding of adverse effect would be appropriate for the Modified I-25 Alternative because a contributing element within a historic district is being demolished. Please refer to 36 CFR 800.5(a)(2)(i), 36 CFR 800.5(a)(2)(ii), and 36 CFR 800.(a)(2)(iv).

In regard to resources that were recommended as having adverse effect, we request further consultation on the nature of the adverse effects. For properties suffering demolition, we would like to explore further options to try to avoid or minimize the adverse effects.

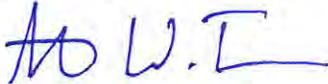
If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



 Edward C. Nichols
State Historic Preservation Officer

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE486	Bessemer Ditch	Alteration to Segment of Linear Resource	No Adverse Effect	Impact To Segment of Linear Resource	No Adverse Effect	concur
5PE564	711 N. Albany Avenue	Indirect	Adverse Effect	Indirect	Adverse Effect	concur
5PE571	2723 Grand Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE584	426 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE586	Mineral Palace Park	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur
*5PE1776	Union Pacific Railroad	Indirect Impact to Segment of Linear Resource		Impact To Segment of Linear Resource		no recommendation at this time
5PE3938	Santa Fe Avenue Bridge	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4179	1612 E. Abriendo Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4436	814 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4437	501 W. 29th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4438	331 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4439	325 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4440	323 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4441	321 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4443	2826 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4444	2808 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4445	2824 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4446	2814 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4447	2820 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE4448	2816 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4449	405 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4450	2629 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4451	411 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4452	219 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4453	411 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4454	2627 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4455	2611 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4456	2621 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4457	2607 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4458	2617 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4459	2534 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4460	2605 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4461	2512 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4462	2603 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4463	2510 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4464	2528 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4466	2526 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4467	2419 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4468	2514 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and –Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4469	2415-17 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4471	2330 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4472	2427 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4473	2324-26 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4474	2405 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4475	2314 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4476	2401 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4477	2310 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4478	2322 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4479	2306 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4480	2318 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4481	101 W. 21st Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4482	2302 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4484	100 W. 23rd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4485	2026 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4486	2006 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4487	2020 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4488	2002 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4489	2015 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4491	2017 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4493	2011 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4495	115 W. 20th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4498	1415 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4499	1405 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4500	106 W. 15th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4502	1210 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4503	1128 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4504	1300 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4505	1012 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4506	1028 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4507	1102 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4509	620 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4510	902 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4512	524 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4513	418 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4514	416 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4515	410 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4516	412 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4518	408 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4520	402 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -ListedHistoric Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4557	219 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4562	221 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4566	311 E. 3rd Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4581	329 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4582	317 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4583	313 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4584	316 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4585	311 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4586	314 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4587	305 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4588	312 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4589	303 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4590	301 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4591	217 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4592	218 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4593	219 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4594	220 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4595	221 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4596	222 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4597	302 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE5013	224 N. Chester Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5015	719 Topeka Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5016	706 Hill Place	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5018	712 Hill Place	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5022	920 Egan Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
*5PE5042	1103-07 S. Santa Fe Avenue	Indirect		Partial Acquisition		
5PE5043	422 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5044	410 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5045	412 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5050	736 Moffat Avenue	Indirect	No Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5052	410 W. 28th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5054	2701 N. Grand Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5056	409 W. 27th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5057	403 W. 27th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5059	2224 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5062	413 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5064	404 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5067	421 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5068	423 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5069	425 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE5106	950 Haven Place	None	NO HISTORIC PROPERTIES AFFECTED	Indirect	No Adverse Effect	concur
5PE5139	Colorado & Wyoming Railroad	Relocation of Segment of Linear Resource	Adverse	Relocation of Segment of Linear Resource	Adverse	concur
5PE5287	2621 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5288	2617 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5289	2615 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5290	2520 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5291	2516 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5292	2424 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5293	106 E. 24th Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5294	107 E. 24th Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5295	2200 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5304	217 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5517	North Side Historic District	Partial Acquisition	No Adverse Effect	Partial Acquisition	No Adverse Effect	do not concur
5PE5518	Second Ward Historic District	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur
5PE5519	The Grove Historic District	Indirect	No Adverse Effect	Indirect	No Adverse Effect	Do not concur with recommendation for Modified I-25 Alt. Concur with Existing I-25 Alt.
5PE5520	Corona Park Historic District	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5523	Steelworks Suburbs Historic District	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur

will be discussed in an Addendum

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE486	Bessemer Ditch	Alteration to Segment of Linear Resource	No Adverse Effect	Impact To Segment of Linear Resource	No Adverse Effect	concur
5PE564	711 N. Albany Avenue	Indirect	Adverse Effect	Indirect	Adverse Effect	concur
5PE571	2723 Grand Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE584	426 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE586	Mineral Palace Park	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur
*5PE1776	Union Pacific Railroad	Indirect Impact to Segment of Linear Resource		Impact To Segment of Linear Resource		no recommendation at this time
5PE3938	Santa Fe Avenue Bridge	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4179	1612 E. Abriendo Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4436	814 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4437	501 W. 29th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4438	331 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4439	325 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4440	323 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4441	321 Beech Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4443	2826 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4444	2808 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4445	2824 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4446	2814 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4447	2820 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative Affected	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative Affected	SHPO Response
5PE4448	2816 N. Greenwood Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4449	405 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4450	2629 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4451	411 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4452	219 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4453	411 W. 28th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4454	2627 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4455	2611 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4456	2621 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4457	2607 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4458	2617 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4459	2534 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4460	2605 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4461	2512 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4462	2603 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4463	2510 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4464	2528 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4466	2526 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4467	2419 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4468	2514 Court Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and –Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4469	2415-17 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4471	2330 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4472	2427 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4473	2324-26 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4474	2405 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4475	2314 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4476	2401 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4477	2310 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4478	2322 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4479	2306 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4480	2318 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4481	101 W. 21st Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4482	2302 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4484	100 W. 23rd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4485	2026 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4486	2006 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4487	2020 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4488	2002 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4489	2015 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4491	2017 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4493	2011 N. Albany Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4495	115 W. 20th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4498	1415 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4499	1405 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4500	106 W. 15th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4502	1210 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4503	1128 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4504	1300 N. Santa Fe Avenue	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4505	1012 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4506	1028 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4507	1102 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4509	620 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4510	902 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4512	524 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4513	418 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4514	416 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4515	410 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4516	412 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4518	408 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4520	402 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -ListedHistoric Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect – Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect – Modified I-25 Alternative	SHPO Response
5PE4557	219 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4562	221 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE4566	311 E. 3rd Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4581	329 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4582	317 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4583	313 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4584	316 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4585	311 E. River Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE4586	314 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4587	305 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4588	312 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4589	303 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4590	301 E. River Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4591	217 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4592	218 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4593	219 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4594	220 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4595	221 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4596	222 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE4597	302 S. Bradford Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE5013	224 N. Chester Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5015	719 Topeka Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5016	706 Hill Place	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5018	712 Hill Place	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5022	920 Egan Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
*5PE5042	1103-07 S. Santa Fe Avenue	Indirect		Partial Acquisition		
5PE5043	422 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5044	410 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5045	412 Kelly Avenue	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5050	736 Moffat Avenue	Indirect	No Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5052	410 W. 28th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5054	2701 N. Grand Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5056	409 W. 27th Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5057	403 W. 27th Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5059	2224 N. Main Street	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5062	413 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5064	404 E. Ash Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5067	421 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5068	423 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur
5PE5069	425 Beech Street	None	No Historic Properties Affected	None	No Historic Properties Affected	concur

Effects Recommendations for all National Register of Historic Places-Eligible and -Listed Historic Properties within the Area of Potential Effects

Resource Identification Number	Address	Impact -Existing I-25 Alternative	Effect - Existing I-25 Alternative	Impact -Modified I-25 Alternative	Effect - Modified I-25 Alternative	SHPO Response
5PE5106	950 Haven Place	None	NO HISTORIC PROPERTIES AFFECTED	Indirect	No Adverse Effect	concur
5PE5139	Colorado & Wyoming Railroad	Relocation of Segment of Linear Resource	Adverse	Relocation of Segment of Linear Resource	Adverse	concur
5PE5287	2621 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5288	2617 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5289	2615 N. Santa Fe Avenue	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5290	2520 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5291	2516 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5292	2424 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5293	106 E. 24th Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5294	107 E. 24th Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5295	2200 N. Freeway	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5304	217 E. 2nd Street	Full Acquisition	Adverse Effect	Full Acquisition	Adverse Effect	concur
5PE5517	North Side Historic District	Partial Acquisition	No Adverse Effect	Partial Acquisition	No Adverse Effect	do not concur
5PE5518	Second Ward Historic District	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur
5PE5519	The Grove Historic District	Indirect	No Adverse Effect	Indirect	No Adverse Effect	Do not concur with recommendation for Modified I-25 Alt. Concur with Existing I-25 Alt.
5PE5520	Corona Park Historic District	Indirect	No Adverse Effect	Indirect	No Adverse Effect	concur
5PE5523	Steelworks Suburbs Historic District	Partial Acquisition	Adverse Effect	Partial Acquisition	Adverse Effect	concur

will be discussed in an Addendum

Colorado Department of Transportation
Richard Zamora, Project Manager
905 Erie St.
Pueblo, CO 81001
May 18, 2010

Dear Sir;

I am writing to protest the widening of I-25 through Pueblo.

First of all, the book was very confusing. There seems to be no rhyme nor reason to the numbering system. The descriptions and maps jump from north to south, back and forth making it very difficult to find particular streets or neighborhoods. The maps do not match the descriptions next to them. Even the lists of properties jump around from one part town to another. Why are the sections not numbered consecutively from north to south? Is it to deliberately confuse the reader? By the way, there are no street names on map labeled exhibit 7-3.

I am stunned by the number of properties, both residential and business, that are to be destroyed. Do these property owners know that CDOT will be taking their property? What about people who rent? Where do they go? Does anyone care?

You are planning to destroy whole historic neighborhoods. Isn't it enough that CDOT destroyed most of these areas in the 1950's? Now you want to take what is left. What is the point in designating a property of historic significance if you are just going to destroy it? The Bessemer Steel Museum being a case in point, you are planning to destroy some of the historical elements, not the buildings actually housing the museum, but other historical elements that added to the history of the mill. And the highway will be practically at their doorstep. Do you understand what the steel mill means to Pueblo, both historically and now? Are you aware of how many years and how many people, both local and statewide worked to bring that museum to fruition? Not to mention the amount of grant money it has brought to Pueblo.

We do not have the amount of traffic that would warrant such a huge expansion of the highway, nor do I see Pueblo growing to that size in the next 20-40 years. Why don't you just repair the road (it has potholes). Also, I don't understand the need for such a huge interchange at the Abriendo exit. It takes out the whole neighborhood! Surely there is a better way to build this section. And, of course, I have not even mentioned Mineral Palace Park which is a travesty and yes, I have seen the mitigation plan.

I am totally against this project, I see no need for it.

Sincerely,



Donna Alber
705 Polk St
Pueblo, Co 81004

Cc to: Wade Broadhead
Pueblo Regional Planning

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



May 27, 2010

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado
1560 Broadway, Suite 400
Denver, CO 80202

SUBJECT: Addendum Report/Eligibility and Effects Determinations, Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Nichols:

This letter and enclosed report constitute a request for concurrence on eligibility and effects determinations and for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). CDOT has been consulting with your office since 2004. Our most recent submittal in April 2010 included effects determinations for 196 properties in the project APE.

Eligibility and Effect Determinations

The enclosed addendum includes eligibility and effects determinations for six properties:

- Four linear resources: Three railroads and their associated segments, including the Union Pacific Railroad (SPE1776/SPE1776.15/SPE1776.16), Missouri Pacific (SPE1899/SPE1899.1), Burlington Northern Santa Fe (SPE7261/SPE7261.1) and one stone retaining wall (SPE6937.1).
- Two industrial properties: Ace Enterprises (SPE7298) and Newton Lumber Company (SPE5042).

New site forms were completed for SPE1776.15, SPE1776.16, SPE7261.1, SPE7298, and SPE6937.1. Re-evaluation forms were completed for SPE1899.1 and SPE5042. Below is a table that summarizes the eligibility of these properties and effects determinations based on the Existing and Modified Alternatives. Please see the attached report and site forms for more information.

Resource Number	Property Name	NRHP Eligibility	Resource Type	Existing Alternative	Modified Alternative
SPE1776 (segments 1776.15, 1776.16)	Union Pacific Railroad	Entire resource eligible, segments retain integrity	linear	Adverse Effect	No Adverse Effect
SPE1899 (segment 1899.1)	Missouri Pacific Railroad	Entire resource eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE7261 (segment 7261.1)	Burlington Northern Santa Fe Railway	Entire resource Eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE6937 (segment 6937.1)	Colorado Smelting Co. retaining walls	Eligible	linear	Effects deter. pending additional information	Adverse Effect

Resource Number	Property Name	NRHP Eligibility	Resource Type	Existing Alternative	Modified Alternative
5PE7298	Ace Enterprises	Not eligible	industrial	No Historic Properties Affected	No Historic Properties Affected
5PE5042	Newton Lumber	Eligible	industrial	No Adverse Effect	No Adverse Effect

Smithsonian Site Number Changes

The report also includes Smithsonian site number changes for six properties that were addressed in previous consultation. The six properties were originally assigned individual site numbers but actually share the same boundary with other properties. Therefore these properties have been combined under single site numbers, as noted in the table below. The attached re-evaluation forms formalize these revisions.

Separate Site Numbers/One Boundary	Revised Site Number
5PE4505 & 5PE4508	5PE4505
5PE4522 & 5PE4524	5PE4522
5PE5080 & 5PE5081	5PE5080

Boundary Revision

CDOT proposes a minor boundary revision for the Newton Lumber Company (5PE5042), a property that was evaluated as eligible in consultation with your office in August 2009. The remains of two railroad spurs were recently discovered along the western boundary of the property and were determined to have a historical association with the property. The boundary has been revised to include these spurs and effects determinations were completed for the two alternatives (see table above). Please see the re-evaluation form for more information.

This information has been sent to the City of Pueblo Planning Office, Colorado Preservation Inc., and the Mountains/Plains Office of the National Trust for Historic Preservation for review. We will provide you with copies of consulting party responses. As you know, CPI and the Trust recently requested consulting party status for this project.

We request your concurrence with the determinations of eligibility and effects and your agreement with the boundary revision for 5PE5042. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Addendum Report and Site forms

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



May 27, 2010

Mr. Wade Broadhead
Planner/HPC Staffer
Department of Planning & Community Development
211 East D. Street
Pueblo, CO 81003

SUBJECT: Addendum Report/Eligibility and Effects Determinations, Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Broadhead:

This letter and enclosed report constitute a request for comments on eligibility and effects determinations and for the Environmental Impact Statement (EIS) referenced above. As you will recall, the EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102). CDOT has been consulting with your office since 2004. Our most recent submittal in April 2010 included effects determinations for 196 properties in the project APE.

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- Four linear resources: Three railroads and their associated segments, including the Union Pacific Railroad (SPE1776/SPE1776.15/SPE1776.16), Missouri Pacific (SPE1899/SPE1899.1), Burlington Northern Santa Fe (SPE7261/SPE7261.1) and one stone retaining wall (SPE6937.1).
- Two industrial properties: Ace Enterprises (SPE7298) and Newton Lumber Company (SPE5042).

New site forms were completed for SPE1776.15, SPE1776.16, SPE7261.1, SPE7298, and SPE6937.1. Re-evaluation forms were completed for SPE1899.1 and SPE5042. Below is a table that summarizes the eligibility of these properties and effects determinations based on the Existing and Modified Alternatives. Please see the attached report and site forms for more information.

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SPE7261 (segment 7261.1)	Burlington Northern Santa Fe Railway	Entire resource Eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE6937 (segment 6937.1)	Colorado Smelting Co. retaining walls	Eligible	linear	Effects deter. pending additional information	Adverse Effect

Resource Number	Property Name	NRHP Eligibility	Resource Type	Existing Alternative	Modified Alternative
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Separate Site Numbers/One Boundary	Revised Site Number
SPE4505 & SPE4508	SPE4505
SPE4522 & SPE4524	SPE4522
SPE5080 & SPE5081	SPE5080

Boundary Revision

CDOT proposes a minor boundary revision for the Newton Lumber Company (SPE5042), a property that was evaluated as eligible in consultation with your office in August 2009. The remains of two railroad spurs were recently discovered along the western boundary of the property and were determined to have a historical association with the property. The boundary has been revised to include these spurs and effects determinations were completed for the two alternatives (see table above). Please see the re-evaluation form for more information.

This information has been sent to the SHPO, Colorado Preservation Inc., and the Mountains/Plains Office of the National Trust for Historic Preservation for review.

As a consulting party, we welcome your comments on these determinations. With past submittals for this project, your office has acted as the main contact and has facilitated reviews with the other consulting parties for this project. We have provided an additional hard copy and CD of the Addendum report to assist in this process. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,



Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Addendum Report and CD (2 copies)

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



May 27, 2010

Ms. Amy Cole
National Trust for Historic Preservation
Mountains/Plains Office
535 16th Street, Suite 750
Denver, CO 80202

SUBJECT: Eligibility and Effects Determinations, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Ms. Cole:

Thank you for your letter dated April 29, 2010 in which you requested participation as a Section 106 consulting party for the project referenced above pursuant to 36 CFR 800.2(c)(5). This letter and enclosed reports constitute a request for your comments on Determinations of Eligibility and Effects, and additional findings associated with the Environmental Impact Statement (EIS) referenced above. The EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Section 106 Consultation

Section 106 consultation for this project has been ongoing since 2002. CDOT has consulted with the State Historic Preservation Officer (SHPO) and the City of Pueblo, who represented the additional consulting parties, including the Bessemer Historical Society and the Pueblo County Historical Society. The project Area of Potential Effects (APE) and survey methodology were identified in a series of meetings in 2002 and 2003, and formalized via correspondence in September 2004. CDOT consulted on eligibility determinations in July 2007, October 2008, March 2009, and August 2009. In early April 2010, CDOT submitted the enclosed Determination of Effects report to the SHPO and consulting parties and just recently sent the enclosed Addendum report to these parties. This submittal includes both of those reports for your review.

Determination of Effects to Historic Properties Report

The Determination of Effects Report includes an analysis of impacts of the No Action Alternative, descriptions of the direct and indirect impacts of the Proposed Build Alternatives, effects determinations of the Build Alternatives on historic properties, and proposed mitigation measures for adverse effects. The report includes effects determinations for 196 properties that were either determined National Register eligible or are being treated as eligible for the purposes of Section 106. This includes five proposed historic districts that have a combined total of 587 contributing properties. Please see the report for more specific information about the effects determinations. The SHPO recently provided comments on the findings in this report. We have enclosed the SHPO response for your information.

Also included for your use is a spreadsheet that lists the properties, summarizes the types of effects by alternative, and includes the effects determination for each Build Alternative. That spreadsheet is included herewith in hard copy, but we will also forward it to your office electronically. Please note that the Newton Lumber Company (SPE5042) and the Union Pacific Railroad (SPE1776) are listed in the enclosed table, but effects determinations for these properties are addressed in the Addendum report.

We have also enclosed a copy of the *New Pueblo Freeway Aesthetics Guidelines*, which provides an overview of proposed aesthetic treatments for the project corridor, including a conceptual drawing of the restoration plan for the historic Mineral Palace Park. The Determination of Effects Report references the Aesthetics Guidelines so we have included it for reference and information purposes only. We are not requesting comments on these guidelines.

Addendum to the Determination of Effects Report

This report was assembled after the enclosed Determination of Effects Report was finalized and submitted for review to SHPO and the other consulting parties in April 2010. It includes properties that were either not addressed in previous consultation efforts or have been updated and require additional consultation. This report includes eligibility and effects determinations, proposed changes to site numbers, and a property boundary revision.

Eligibility and Effect Determinations

The enclosed addendum includes eligibility and effects determinations for six properties:

- Four linear resources: Three railroads and their associated segments, including the Union Pacific Railroad (SPE1776/SPE1776.15/SPE1776.16), Missouri Pacific (SPE1899/SPE1899.1), Burlington Northern Santa Fe (SPE7261/SPE7261.1) and one stone retaining wall (SPE6937.1).
- Two industrial properties: Ace Enterprises (SPE7298) and Newton Lumber Company (SPE5042).

New site forms were completed for SPE1776.15, SPE1776.16, SPE7261.1, SPE7298, and SPE6937.1. Re-evaluation forms were completed for SPE1899.1 and SPE5042. Below is a table that summarizes the eligibility of these properties and effects determinations based on the Existing and Modified Alternatives. Please see the attached report and site forms for more information.

Resource Number	Property Name	NRHP Eligibility	Resource Type	Existing Alternative	Modified Alternative
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SPE7261 (segment 7261.1)	Burlington Northern Santa Fe Railway	Entire resource Eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE6937 (segment 6937.1)	Colorado Smelting Co. retaining walls	Eligible	linear	Effects deter. pending additional information	Adverse Effect
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Smithsonian Site Number Changes

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Separate Site Numbers/One Boundary	Revised Site Number
5PE4505 & 5PE4508	5PE4505
5PE4522 & 5PE4524	5PE4522
5PE5080 & 5PE5081	5PE5080

Boundary Revision

CDOT proposes a minor boundary revision for the Newton Lumber Company (5PE5042), a property that was evaluated as eligible in August 2009. The remains of two railroad spurs were recently discovered along the western boundary of the property and were determined to have a historical association with the property. The boundary has been revised to include these spurs and effects determinations were completed for the two alternatives (see table above). Please see the re-evaluation form for more information.

As a Section 106 consulting party, we welcome your comments on these determinations. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Should you require additional time, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible to discuss a reasonable extension period. If you require additional information, please also contact Ms. Schoch.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

- Determination of Effects report
- Determination of Effects CD
- Effects Recommendations Response Table
- New Pueblo Freeway Aesthetics Guidelines
- Addendum Report

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



May 27, 2010

Mr. Patrick A. Eidman
Colorado Preservation, Inc.
333 W. Colfax Avenue, Suite 300
Denver, CO 80204

SUBJECT: Eligibility and Effects Determinations, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Eidman:

Thank you for your letter dated May 5, 2010 in which you requested participation as a Section 106 consulting party for the project referenced above pursuant to 36 CFR 800.2(c)(5). This letter and enclosed reports constitute a request for your comments on Determinations of Eligibility and Effects, and additional findings associated with the Environmental Impact Statement (EIS) referenced above. The EIS will be used to determine potential environmental impacts for proposed capacity improvements along an eight mile segment of I-25 in Pueblo between the interchanges at Pueblo Boulevard (milepost 94) and 29th Street (milepost 102).

Previous Section 106 Consultation

Section 106 consultation for this project has been ongoing since 2002. CDOT has consulted with the State Historic Preservation Officer (SHPO) and the City of Pueblo, who represented the additional consulting parties, including the Bessemer Historical Society and the Pueblo County Historical Society. The project Area of Potential Effects (APE) and survey methodology were identified in a series of meetings in 2002 and 2003, and formalized via correspondence in September 2004. CDOT consulted on eligibility determinations in July 2007, October 2008, March 2009, and August 2009. In early April 2010, CDOT submitted the enclosed Determination of Effects report to the SHPO and consulting parties and just recently sent the enclosed Addendum report to these parties. This submittal includes both of those reports for your review.

Determination of Effects to Historic Properties Report

The Determination of Effects Report includes an analysis of impacts of the No Action Alternative, descriptions of the direct and indirect impacts of the Proposed Build Alternatives, effects determinations of the Build Alternatives on historic properties, and proposed mitigation measures for adverse effects. The report includes effects determinations for 196 properties that were either determined National Register eligible or are being treated as eligible for the purposes of Section 106. This includes five proposed historic districts that have a combined total of 587 contributing properties. Please see the report for more specific information about the effects determinations. The SHPO recently provided comments on the findings in this report. We have enclosed the SHPO response for your information.

Also included for your use is a spreadsheet that lists the properties, summarizes the types of effects by alternative, and includes the effects determination for each Build Alternative. That spreadsheet is

included herewith in hard copy, but we will also forward it to your office electronically. Please note that the Newton Lumber Company (SPE5042) and the Union Pacific Railroad (SPE1776) are listed in the enclosed table, but effects determinations for these properties are addressed in the Addendum report.

We have also enclosed a copy of the *New Pueblo Freeway Aesthetics Guidelines*, which provides an overview of proposed aesthetic treatments for the project corridor, including a conceptual drawing of the restoration plan for the historic Mineral Palace Park. The Determination of Effects Report references the Aesthetics Guidelines so we have included it for reference and information purposes only. We are not requesting comments on these guidelines.

Addendum to the Determination of Effects Report

This report was assembled after the enclosed Determination of Effects Report was finalized and submitted for review to SHPO and the other consulting parties in April 2010. It includes properties that were either not addressed in previous consultation efforts or have been updated and require additional consultation. This report includes eligibility and effects determinations, proposed changes to site numbers, and a property boundary revision.

Eligibility and Effect Determinations

The enclosed addendum includes eligibility and effects determinations for six properties:

- Four linear resources: Three railroads and their associated segments, including the Union Pacific Railroad (SPE1776/SPE1776.15/SPE1776.16), Missouri Pacific (SPE1899/SPE1899.1), Burlington Northern Santa Fe (SPE7261/SPE7261.1) and one stone retaining wall (SPE6937.1).
- Two industrial properties: Ace Enterprises (SPE7298) and Newton Lumber Company (SPE5042).

New site forms were completed for SPE1776.15, SPE1776.16, SPE7261.1, SPE7298, and SPE6937.1. Re-evaluation forms were completed for SPE1899.1 and SPE5042. Below is a table that summarizes the eligibility of these properties and effects determinations based on the Existing and Modified Alternatives. Please see the attached report and site forms for more information.

Resource Number	Property Name	NRHP Eligibility	Resource Type	Existing Alternative	Modified Alternative
SPE1776 (segments 1776.15, 1776.16)	Union Pacific Railroad	Entire resource eligible, segments retain integrity	linear	Adverse Effect	No Adverse Effect
SPE1899 (segment 1899.1)	Missouri Pacific Railroad	Entire resource eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE7261 (segment 7261.1)	Burlington Northern Santa Fe Railway	Entire resource Eligible, segments retain integrity	linear	No Adverse Effect	No Adverse Effect
SPE6937 (segment 6937.1)	Colorado Smelting Co. retaining walls	Eligible	linear	Effects deter. pending additional information	Adverse Effect
SPE7298	Ace Enterprises	Not eligible	industrial	No Historic Properties Affected	No Historic Properties Affected
SPE5042	Newton Lumber	Eligible	industrial	No Adverse Effect	No Adverse Effect

Smithsonian Site Number Changes

The report also includes Smithsonian site number changes for six properties that were addressed in previous consultation. The six properties were originally assigned individual site numbers but actually share the same boundary with other properties. Therefore these properties have been combined under single site numbers, as noted in the table below. The attached re-evaluation forms formalize these revisions.

Separate Site Numbers/One Boundary	Revised Site Number
SPE4505 & SPE4508	SPE4505
SPE4522 & SPE4524	SPE4522
SPE5080 & SPE5081	SPE5080

Boundary Revision

CDOT proposes a minor boundary revision for the Newton Lumber Company (SPE5042), a property that was evaluated as eligible in August 2009. The remains of two railroad spurs were recently discovered along the western boundary of the property and were determined to have a historical association with the property. The boundary has been revised to include these spurs and effects determinations were completed for the two alternatives (see table above). Please see the re-evaluation form for more information.

As a Section 106 consulting party, we welcome your comments on these determinations. Given the size of this submittal, we are aware that the standard 30-day review time frame may not be sufficient. Should you require additional time, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258 as soon as possible to discuss a reasonable extension period. If you require additional information, please also contact Ms. Schoch.

Very truly yours,


for Brad Beckham, Manager
Environmental Programs Branch

Enclosures:

Determination of Effects report
Determination of Effects CD
Effects Recommendations Response Table
New Pueblo Freeway Aesthetics Guidelines
Addendum Report

cc: Lisa Streisfeld, CDOT Region 2 (w/o enclosures)
Chris Horn, FHWA (w/o enclosures)



JUN 7 PM 1:27

June 1, 2010

Dan Jepson
Senior Staff Archaeologist and Cultural Resource Program Manager
Environmental Programs Branch
4201 E. Arkansas Ave.
Denver, CO 80222

Re: Determinations of Effects for Archaeological Sites, CDOT Project IM-0251-156, New Pueblo Freeway EIS, Pueblo County (CHS #43967)

Dear Mr. Jepson,

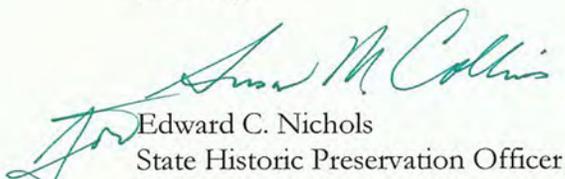
Thank you for your correspondence dated April 16, 2010 (received by our office on April 21, 2010) and the documentation provided regarding the subject project.

Following our review of the documentation provided, we concur with the following determinations of effect:

1. Should the "Modified" Alternative be selected, sites 5PE5458 and 5PE5483 would be adversely affected, and a finding of **adverse effect** would be appropriate with specific reference to these two sites.
2. Should the "Modified" Alternative be selected, 5PE5408, 5PE5431, and 5PE5467 would not be affected and a finding of **no historic properties affected** would be appropriate with specific reference to these three sites only.
3. Should either the No Action Alternative or "Existing" Alternatives be selected, a finding of **no historic properties affected** would be appropriate with specific reference to the following sites: 5PE5458, 5PE5483, 5PE5408, 5PE5431, and 5PE5467.

Thank you for the opportunity to comment. We look forward to continued consultation on the New Pueblo Freeway Project. If we may be of further assistance please contact Shina duVall, Section 106 Compliance Manager, at (303) 866-4674 or shina.duvall@chs.state.co.us.

Sincerely,


Edward C. Nichols
State Historic Preservation Officer
ECN/SAD



June 14, 2010

Brad Beckham
Manager
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Addendum Report/Eligibility and Effects Determinations, Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement. (CHS #44746)

Dear Mr. Beckman:

Thank you for your correspondence dated May 27, 2010 and received by our office on June 2, 2010 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we concur with the recommended findings of National Register eligibility for the properties listed below.

- 5PE.1776. Including segments 5PE.1776.16 and 5PE.1776.16.
- 5PE.1899. Including segment 5PE.1899.1.
- 5PE.7261. Including segment 5PE.7261.1.
- 5PE.5042. We concur with the historic boundary adjustment.
- 5PE.6937. Including 5PE.6937.1.
- 5PE.7261. Including 5PE.7261.1.
- 5PE.7298

After review of the recommended assessment of adverse effect under Section 106, we concur with the findings of effect for the historic properties listed below.

- 5PE.1899
- 5PE.5042. We concur with the recommended finding of no adverse effect under the Existing I-25 Alternative because the rail spurs lack integrity and does not support the overall eligibility of the entire site.
- 5PE.6937
- 5PE.7261
- 5PE.7298

We are not able to concur with the recommended assessment of adverse effect under Section 106 for the historic properties listed below.

- 5PE.1776. We concur with the finding of adverse effect under the Existing Alternative, but we are not able to concur with the finding of no adverse effect under the Modified Alternative. Part of a segment that supports the overall eligibility of an entire linear resource, 5PE.1776, is being destroyed. According to 36 CFR 800.5(a)(2)(i), the destruction of damage to part of a property is defined as an adverse effect.
- 5PE.5042. We are not able to concur with the recommended finding of no adverse effect at this time. According to the survey report, “the eastern portion of the rails (leading up to the buildings and between the buildings) retains a much greater degree of integrity” than the western edge of the spur. Does CDOT feel that the eastern portion retains integrity and supports the overall eligibility of the property?

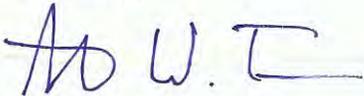
If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



 Edward C. Nichols
State Historic Preservation Officer

News From

The Colorado Department of Transportation

www.dot.state.co

.us

June 22, 2010
(303) 757-9431

Contact: Bob Wilson, CDOT Public Relations,

I-25 PAVING THROUGH PUEBLO SET TO START

PUEBLO – The Colorado Department of Transportation (CDOT) begins paving Interstate 25 through Pueblo next week. In addition to rotomilling and resurfacing the highway, the project includes new guardrails and signing, earthwork, seeding and striping.

Work begins on Monday night, June 28. Northbound and/or southbound I-25 will be reduced to a single lane at various locations between the south Pueblo city limit (mile 92) and the U.S. 50 interchange (Exit 100), during the following hours:

- **South of Indiana Avenue:** Sunday through Thursday, 6 p.m. to 6:30 a.m.; Monday through Friday, 8:30 a.m. to 4 p.m. (daytime work planned during latter stage of project)
- **North of Indiana Avenue:** Sundays, 10 p.m. to 6:30 a.m.; Monday through Thursday, 9 p.m. to 6:30 a.m.

The speed limit will be reduced to 45 mph and vehicles wider than 12 feet will be prohibited from traveling through the work zone during project hours.

In addition, two full-time (24/7), single lane closures will be required for a couple of weeks on I-25 for inlet and pipe work, and construction of a new concrete median barrier. The round-the-clock closures will accelerate the work schedule, allowing the lanes to reopen sooner.

New expansion joints also will be installed on numerous bridges and overpasses, including Pueblo Boulevard, Indiana, Central, and Abriendo avenues, the Arkansas River, Santa Fe Drive, at Ilex, 1st, 4th, 5th and 13th streets, and U.S. 50.

“Drivers should plan on a little extra travel time since we’ll usually only have one lane open to traffic in each direction,” says CDOT Project Engineer Rod Abbott. “Delays shouldn’t be too extensive

since all the work that impacts traffic is taking place at night. “However, we’re urging drivers to please obey the reduced speed limit because lots of activities will be taking place when the visibility is significantly reduced and we need to maintain a safe environment for both the traveling public and our construction crews.”

To minimize traffic impacts, there will be no lane closures during the National Little Britches Rodeo Finals, between July 26 and 31, and the State Fair, Aug. 28 to Sept. 7.

The \$5.4 million project is scheduled for completion in October 2010. Lafarge West Inc. of Longmont, Colo. is the prime contractor.

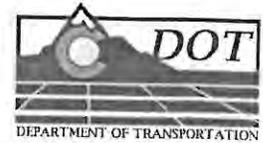
Updated information regarding traffic impacts on this or other CDOT projects is available at www.dot.state.co.us/TravelInfo/currentcond/ or by calling 511. To receive project updates via e-mail, visit www.coloradodot.info and click on the cell-phone icon in the upper right-hand corner. The link takes you to a list of items you can subscribe to, including *Southeast Colorado*.

###

taking care to get you there

DEPARTMENT OF TRANSPORTATION

Region 2
Planning and Environmental Division
1480 Quail Lake Loop
Colorado Springs, CO 80906
(719) 227-3248 voice
(719) 227-3298 fax



July 15, 2010

Ms. Donna Alber
705 Polk Street
Pueblo, Colorado 81004

Subject: CDOT Project IM 0251-156, The New Pueblo Freeway Environmental Impact Statement

Dear Ms. Alber:

Thank you for your May 18, 2010 letter, regarding the project referenced above, which involves safety and capacity improvements on I-25 in Pueblo. Your letter references the analysis of the project's impacts to historic properties identified in the *Determination of Effects to Historic Properties: I-25 New Pueblo Freeway Improvement Project* (effects report), which was submitted to the State Historic Preservation Officer (SHPO) and consulting parties as part of the Section 106 review process in April 2010. You had questions about the structure of the report, as well as the numbers of properties that will be affected by the project. You also had concerns about the overall purpose of the project. We have provided responses to your concerns below.

You indicated that the effects report was difficult to navigate. We spent considerable time organizing the content of the report so that it would be easy to review. The report includes a lengthy introduction that explains the report structure and how effects to properties were evaluated. The report is also consistent with how we typically format these types of documents for Section 106 consultation with the SHPO, local governments, and historic preservation groups. Please be assured that our intent that the report format and the detailed graphics would make the review process easier for readers.

You are correct that this project will impact numerous historic properties. CDOT conducted field surveys and prepared a detailed historic context of the City of Pueblo that includes historical information about the steel mill, Mineral Palace Park and the City's neighborhoods, so we are aware of the important resources that will be affected by this project. Over the years, CDOT has met many times with various stakeholders, and property owners at public open house meetings. The team has also met with the City and various community groups. In addition, CDOT has involved the SHPO and the consulting parties, including the City of Pueblo, in the process of identifying historic properties and defining neighborhood districts. The design team carefully prepared alternatives to maximize ways to reduce impacts to historic properties. Through this coordination effort, CDOT has tried to reduce impacts to the City of Pueblo's neighborhoods, the steel mill, Mineral Palace Park, and other important resources along the interstate corridor.

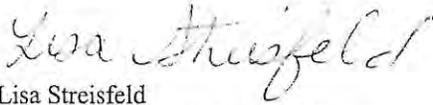
CDOT has been studying the I-25 corridor in Pueblo for a number of years in the format of an Environmental Impact Statement (EIS). The I-25 highway infrastructure is aging and CDOT needs to plan for maintaining and improving the interstate system, which is vital to the City of Pueblo. The interstate provides regional access throughout the state of Colorado to move people and goods. Two build alternatives and one non-build alternative will be described in the draft EIS. These alternatives will accommodate projected traffic volumes for the next 20 years.

Once the draft EIS is published (we anticipate 2011), the public will have an opportunity to review and provide comments. Additionally, we will hold a formal public hearing to solicit comments and questions from the public. So, the team does appreciate your feedback now and will certainly again during the formal public comment period. I

will also have your name and address added to the project mailing list to receive notification about the publication of the EIS.

As you suggest, CDOT will still maintain I-25. Please note that a resurfacing project began on June 28th. Please see the attached news release for additional information. Once again, the project team greatly appreciates your letter. If you have any further questions about the project, please call me at: (719) 227-3248. If you have questions about historic properties and the Section 106 process, please contact Senior Staff Historian Lisa Schoch at 303-512-4258.

Sincerely,



Lisa Streisfeld
Environmental and Planning Manager
CDOT Region 2

Cc:

Richard Zamora, CDOT Resident Engineer
Tom Wrona, CDOT Program Engineer
Lisa Schoch, CDOT Senior Historian
Wade Broadhead, City of Pueblo

Attachment

July 23, 2010

Ms. Lisa Schoch
CDOT
Environmental Programs Branch
4201 East Arkansas Ave.
Denver, CO 80222

Mountains/Plains
OFFICE

Re: I-25 Pueblo Freeway Section 106 Consultation

Dear Lisa:

Thank you for holding a consulting parties meeting earlier this month. We were pleased to have the opportunity to gain more information about the project, meet members of the project team and share concerns about the effect the project could have on historic properties.

A general comment on the effects determination document: It seems like it would be easier for the reader to understand the narrative if the indirect and direct effects were grouped together instead of being spread into two sections of the document. In addition, in certain places the discussion about some historic properties, such as the Steelworks Suburbs District, addresses both direct and indirect effects but is found only in "Section 5: Directly Impacted Historic Properties." For clarity, Table B-8 could also be revised to show "direct" adverse effects, rather than using the terms "partial or full acquisition."

We ask you to reconsider the No Adverse Effect determination for 5PE41789, the Minnequa Steel Works Office complex. While the complex is a contributing element of the Steelworks Suburbs Historic District (which we agree is adversely effected by both the modified and existing alternatives), it's also an individually listed National Register property. A number of characteristics (such as increased height of the new roadway, visual intrusions, demolition of structures within the mill complex, etc.) are cited as contributing to the adverse effect determination for the Steelworks District. *Determination of Effects at 5-103-104*. However, later in the document these same characteristics are cited as being "minor" and not sufficient to trigger an adverse effect determination for the individually listed Minnequa Steel Works Office Building. *Id.* at 6-16. We disagree and feel that the changes to the character-defining features of the Office Building under either alternative warrant an Adverse Effect determination.

Mountains/Plains Office

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Based on our in consulting parties discussion, we agree that because the details of the preferred alignment, more complete information about adverse effects (particularly within the CF & I complex), and the impact of implementation of other documents such as the Mineral Palace Park Plan and the design guidelines will not be known for some time into the future, a Programmatic Agreement, rather than an MOA is the preferred way to proceed under Section 106.

Finally, from the dialogue at the recent meeting and from Section 8.2 of the Determination of Effects document, we realize that there are many different ideas being proposed for mitigation of adverse effects. However, we remind you that NHPA requires you to “seek ways to *avoid, minimize or mitigate* any adverse effects on historic properties.” 36 C.F.R. 800.1(a). We feel that it’s premature to have a discussion about mitigation at this early stage in the project and is yet another reason to support a PA. This discussion is especially critical as it relates to the CF & I complex which is an iconic, defining part of Pueblo’s history. If it is possible to avoid or minimize effects to elements of that site, we should work towards that goal first before designing mitigation.

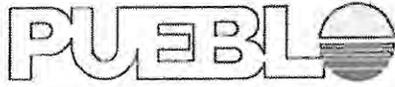
Thank you for considering our comments and please let me know if you have any questions.

Sincerely,



Amy Cole
Sr. Program Officer &
Regional Attorney

cc: Amy Pallante, CO State Historic Preservation Office
Jim Hare & Patrick Eidman, Colorado Preservation, Inc.
Wade Broadhead, Department of Planning and Community Development,
City of Pueblo



Planning & Community Development
Jerry M. Pacheco, Director

211 East D Street | Pueblo, Colorado 81003 | Tel 719-553-2259 | Fax 719-553-2359 | TTY 719-553-2611 | www.pueblo.us

August 3, 2010

To: Dan Jepson
4201 E. Arkansas Street, Shumate Building
Denver, Colorado

From: Wade Broadhead, Planner for the Pueblo Historic Preservation Commission
Planning and Community Development
211 E. D. Street
Pueblo, CO 81003

**RE: Official Response to the Determinations of Effects to Historic Properties: I-25
New Pueblo Freeway Improvement Project**

Dear Mr. Jepson,

The City has completed a review of the report received from CDOT regarding the proposed impacts to historic properties associated with the New Pueblo Freeway project. Planning and Community Development staff met to review the findings and we also engaged Historic Pueblo Inc, Pueblo County Historical Society, and the Bessemer Historic Society. I provided a summary of the principal issues to the Pueblo Historic Preservation Commission at their regularly scheduled meeting on May 15, 2010.

There are some areas of historic significance that the City and consulting parties have highlighted.

Steelworks Suburb (SPE5523). First and foremost the City is very concerned with the impact to the historic Colorado Fuel and Iron steel mill complex located near the intersection of Northern Avenue and I-25. This portion of the mill is the last remaining piece of the original operation and one of the few left in the United States. We feel the remaining plant structures in combination with the administration buildings form the core of the Steelworks Suburb Historic District and the proposed loss of the structures and buildings would be degrade that district's eligibility.

In particular, the city agrees that the removal of the remaining blast furnace stoves and stack is a significant adverse effect. Although the furnace is missing, the stack and stoves are the last remaining portion of a seven blast furnace complex that was the most visually representative aspect of the mill operation for the public. Since the switch to a modern ARC furnace, this resource has become an iconic element of Pueblo's proud Steel City history. The removal of this element should be avoided at all costs and if it is not possible mitigation should entail preservation of other mill buildings or creating

something equally iconic that represents Pueblo's proud, steel mill heritage. We **STRONGLY** oppose the demolition of the remaining blast furnace structures.

Second, the removal of the tunnel under I-25 is an adverse impact. Many people would like to see the tunnel stay open in the hopes of one day reconnecting a link with the mill for heritage tourism. It is also a very culturally and socially important point in the project area, as many remember their family members exiting work through the tunnel. The exit located on Steelworks Museum property is probably the most significant aspect of the tunnel history, but people also wanted the tunnel itself preserved. The City understands the difficulty preserving the actual tunnel, but feedback from the community was overwhelmingly against its closure.

Third, the Highline railroad is considered important although it may be difficult to preserve this element due to the rearrangements of the right of way and roadway.

St. Mary's Genealogical Center, 211 E Mesa Avenue. This resource is a locally designated historic landmark and located in the Steelworks Suburb adjacent to Benedict Park. With the removal of Benedict Park and relocation of the modified alignment to run alongside the St. Mary's property, we feel this is an adverse impact to this existing local landmark not identified in the report.

Columbus Hall. (SPE5948). This building would be demolished for the new Benedict Park under the modified alignment. We believe this building is socially and architecturally significant for the role it played in the development of the Eiler's /East Mesa neighborhood and for the eastern aspect of the Northern Avenue commercial district associated with the early Steelworks suburb. A lacking site form history hides the fact that this building was strongly associated with the Slavic residents of this part of the Steelworks Suburb. We also do not wish to see an important two story commercial building demolished when it appears there might be a way to avoid it. The demolition of this building would be an adverse impact and require mitigation and the HPC can provide and additional resources to determine the buildings eligibility. The City would like to see the building preserved and incorporated into the design of the proposed park.

The Santa Fe Avenue Steel Truss Bridge (SPE3938). The HPC and City Staff would like to see CDOT look at creative ways of reusing the bridge for a trail system or reuse within the city. The City has already been in talks with CDOR regarding a possible reuse of the bridge and continues to examine alternative uses of the structure. The removal of the bridge would be an adverse impact. With other steel truss bridges coming down across Pueblo, these are becoming an endangered resource which also demonstrates an earlier era when steel dominated our skyline.

Mineral Palace Park (SPE586). Despite some concerns, overall the mitigation plan has widespread public support in the community and the City does understand that some WPA retaining walls will have to be removed for the park enhancements. The loss of the WPA walls is contingent on the proposed park upgrades and future historic mitigation for the walls, and any change in either plan would mean a reevaluation of our position. So

the City would be most interested in discussing mitigation for the loss of the walls. Potential mitigation ideas for Mineral Palace include interpretive signage, stabilization of the remaining walls and buildings, or a play structure or shade structure that incorporates aspects of the old Mineral Palace.

Second Ward Historic District (SPE5518). The expansion of the freeway and destruction of additional buildings further degrades the neighborhood that was almost destroyed by the initial Freeway constriction. Loss of integrity is the biggest problem with this district; however, the additional impacts by CDOT are an adverse impact and require mitigation. A context study of this landform/historic districts would be in order to better share and document what was once a rich and thriving neighborhood adjacent to downtown.

The Grove Historic District (SPE5519). This is one district that has been completely severed by the initial I-25 through Pueblo to the point it is barely a functioning neighborhood anymore. Under the modified alignment one building is removed and streets are 'cul-de-saced', as well as more elevated roadway causing visual impacts as stated in the report on page 5-90, creating some enhancements and some further isolation for the area. The previous I-25 project and new impacts under the modified alignment would constitute a slight adverse impact to the historic district.

General Comments

Pueblo has numerous, active, groups interested in this project and the Pueblo Historic Preservation Commission is eager to be an active participant in the ongoing process, and provide feedback on historic resources, impacts, and mitigation. The PHPC has an active Neighborhood Heritage Enhancement program which is attempting to provide well researched and written historic context to all 'historic' neighborhoods. In neighborhoods that have been heavily impacted by the previous highway and other impacts, context studies may be the most effective means of mitigation. Context studies as well as the creation of park elements that honor the areas history and celebrate a neighborhood's distinct identity are other mitigation avenues the City would like to see CDOT pursue.

After the meeting July 12, 2010 with CDOT, SHPO, National Trust, CPI, and the City of Pueblo, a Programmatic Agreement would be an appropriate method to document the resources and issues important to Puebloans and ensure that consulting parties have further opportunities to provide feedback as the project progresses. For a project with such a long time window, agreeing on important issues, resources, and strategies is very important. We liked the idea of additional chances to comment on the project especially regarding the steel mill as discussion or designs evolve.

Also, early mitigation is also recommended. A formal Bessemer historic context study and/or further research with the *Bessemer Indicator* newspaper records could provide information that would facilitate better decisions with regards to impacts at the CF and I Headquarters, Dispensary, and Steel Mill complex. The ability to document improvements in the mill and their impact on the neighborhood development patterns is a

crucial aspect to understanding significance and integrity and has been a research goal for BHS and PCHS for some time. To assist in the documentation of the historic steelworks complex, a comprehensive HAERS documentation/recordation should be conducted of the northwest corner of the mill by experienced historians with a background in industrial technology, immediately, both to assist planning and as part of the mitigation.

These are by no means an exhaustive list of mitigation measures, and each area will require different strategies.

Sincerely,

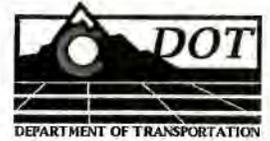
 8/3/10

Wade Broadhead, Planner, Staff for the Pueblo Historic Preservation Commission
for
Jerry Pacheco, City Manager and Director of Planning and Community Development
Department

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 7, 2010

Wade Broadhead
Planning and Community Development
211 East D Street
Pueblo, CO 81003

SUBJECT: Additional Information Regarding Effects Determinations, CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement

Dear Mr. Broadhead:

Thank you for your response dated August 3, 2010 regarding the project referenced above. Responses to your specific comments are included below, organized by property name and number as they appeared in your letter.

Steelworks Suburb (5PE5523): We appreciate your comments regarding project effects to the former Colorado Fuel and Iron steel mill complex, including the remaining blast furnaces and stoves, the Highline Railroad, and the tunnel under I-25. As we discussed in our July 12, 2010 meeting with you, SHPO, and the other consulting parties, there may be additional opportunities to avoid these resources during design of this phase of the project but the specific details are unknown at this time. FHWA and CDOT will continue to include you in the consultation process, which will include mitigation for the Steelworks Suburb District.

St. Mary's Genealogical Center (5PE588): The St. Mary's property, which is identified as officially eligible for the NRHP in the Office of Archaeology and Historic Preservation Compass database, should have been evaluated individually in our March 2010 effects report but was not. The effects report only considered the property as a contributing property to the Steelworks Suburb. We apologize for this oversight and are providing an effects determination for the St. Mary's property as an individually eligible property at this time.

As noted in Exhibits 5-50 (p. 5-97) and 5-59 (p. 5-109) and Table B-5 (Appendix B, B-14) of the effects report, the Existing Alternative results in no direct impacts to the property, and the Modified Alternative results in the acquisition of land at the northwest corner of the property. The CDOT project team evaluated the Modified Alternative and revised the design to avoid the direct impact to the property's northwest corner (see attached graphic). However, CDOT agrees with your assessment that the removal of Benedict Park and the proximity of the Modified Alternative alignment results in an *adverse effect* to the setting, feeling, and association of St. Mary's. CDOT also assessed the effects of the Existing Alternative on the St. Mary's property and has determined that this alternative results in *no adverse effect*. Although a portion of Benedict Park will be acquired, the Existing Alternative alignment still generally follows the footprint of the existing I-25 in this area and is actually below grade at Mesa Avenue, where the property is located.

King Taco/Columbus Hall (SPE4948): In May 2009, we consulted with you and SHPO regarding the NRHP eligibility of this building and determined that it lacks integrity and is not individually eligible, but that it is a *contributing* element of the Steelworks Suburb District (SPE5523). As such, the building was not evaluated individually for effects; rather, it was included in the analysis of effects to the district as a whole. There is an *adverse effect* to the Steelworks Suburb District under both alternatives, and CDOT will work with SHPO and the consulting parties to develop mitigation for the district, which includes King Taco/Columbus Hall (SPE4948). We appreciate your continued concern for this property, and will take into account your suggestions for mitigation involving the building.

Santa Fe Avenue Bridge (SPE3938): You provided some mitigation ideas for the bridge, which will be adversely affected by the project. As part of the Section 106 process, we will be evaluating mitigation options for the bridge, including the Adopt-a-Bridge program, in which we advertise the bridge to potential adopters for adaptive re-use in a new location.

Mineral Palace Park (SPE586): Thank you for providing possible mitigation concepts for Mineral Palace Park, and specifically for the WPA walls in the park. We will take these into consideration as we develop a mitigation plan for the project corridor.

Second Ward Historic District (SPE5518): We appreciate your mitigation suggestions for this district and will consider these as we move forward in the development of a mitigation plan for the project corridor.

Grove Historic District (SPE5519): In October 2008, we consulted with SHPO and your office regarding the eligibility of the Grove Historic District. During that consultation, CDOT determined that the Grove neighborhood on the west side of I-25 was significant and retained the integrity to be a potential district. CDOT also determined that the section of the neighborhood east of the interstate and South Santa Fe and south of the Arkansas River is not part of the proposed district because it has been separated by highway construction and the continuity of the neighborhood was lost. We agree that the neighborhood was severed by past highway construction, but disagree with your comment that the district itself was severed, since the district has been limited to the residential and commercial properties on the west side of I-25 and the proposed district was only developed in the past few years—well after the construction of the original highway alignment between 1949 and 1959.

We also disagree that there is an adverse effect to the proposed Grove District based on the Modified Alignment. Under this alternative, the project will involve the acquisition of two contributing features and changes to streets within the district boundary. Unlike individual historic properties, a district “derives its importance from being a unified entity, even though it is composed of a wide variety of resources,” and under the Modified Alternative all but two of the district’s variety of resources will remain intact, including the district’s significant commercial and residential buildings. The two buildings that will be demolished (SPE4680 and SPE4681) are located on the far southeast edge of the district adjacent to Santa Fe Avenue and their removal will not affect the overall cohesiveness of the Grove District or its ability to convey its unified identity or its significance under NRHP Criteria A and C. We also believe that the plan to cul-de-sac Clark and C Streets, and the changes to Santa Fe Avenue will neither alter the cohesiveness of the district nor its ability to convey its significance. CDOT maintains that the Modified Alternative will result in *no adverse effect* to the proposed Grove historic district.

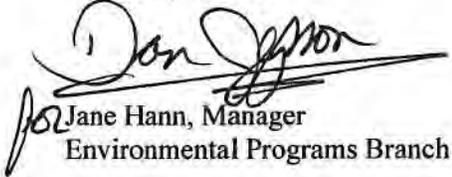
Programmatic Agreement

Based on our July 12, 2010 with SHPO and the consulting parties, FHWA and CDOT are developing a Programmatic Agreement that will outline mitigation for the project corridor as well as how Section 106

will be implemented for future phases of this project. We appreciate all of your suggested mitigation strategies and look forward to working with you and the consulting parties in the development of this agreement.

If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures:

St. Mary's (5PE588), Graphic—Modified Alternative

cc: Lisa Streisfeld, CDOT Region 2
Chris Horn, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 7, 2010

Ms. Amy Cole, Regional Attorney
National Trust for Historic Preservation
Mountains/Plains Office
535 16th Street, Suite 750
Denver, CO 80202

SUBJECT: Additional Information, CDOT Project IM 0251-156, New Pueblo Freeway
Environmental Impact Statement (CHS #44746)

Dear Ms. Cole:

Thank you for your response dated July 23, 2010 regarding the project referenced above. Responses to your specific comments are provided below.

Report Format

We appreciate your comments regarding the format of the Determination of Effects report. Given the project scope and the numbers of historic properties, we tried to simplify the report by separating properties based on whether they were directly or indirectly affected by the project. However, we recognize that there were some properties where effects were both indirect and direct. With regard to Table B-8, we included the distinction between partial and full acquisitions to provide reviewers more detail regarding whether only part or all of a property would be impacted. We apologize for any confusion this may have caused during your review. There are no plans at this time to revise this report or to develop an addendum.

Minnequa Steel Works Office Complex (5PE4179)

We would like to clarify an error in the text regarding the Minnequa Steel works Office Complex. On pages 5-102 and 5-111 of the effects report, CDOT indicated that the individually eligible Minnequa Steel Works Office Complex (5PE4179) was adversely affected by both alternatives. The *no adverse effect* finding of the office complex as provided on pages 6-11 through 6-16 is the correct effects determination for this property.

In your letter, you disagreed with CDOT's determination that there is *no adverse effect* to the Minnequa Steel Works Office Complex based on the Existing and Modified Alternatives, stating that the character-defining features of the property will be altered by some of the same impacts that CDOT determined result in an adverse effect to the overall Steelworks Suburb District (5PE5523) (of which the office complex is a contributing feature). We disagree with your assessment. The property at 5PE4179 is indirectly impacted by the changes to the overall steel mill, including the elevation of the roadway in this area, the change in tunnel access, impacts to structures on the steel mill property, and changes in noise levels, but these effects do not diminish the integrity of the property. The office complex and its immediate setting will remain intact and will still convey significance under both Criteria A and C. Association with the steel mill is part of what makes the individual office complex significant but the

2002 National Register of Historic Places (NRHP) nomination for 5PE4179 highlights the significance of the separate office complex property, noting that

“although the plant’s industrial operations are located nearby, separated from the office complex by Interstate 25, these facilities have undergone substantial changes over the years, prompted by technological advances and the widening of the highway. Therefore the complex of administrative buildings best represents Minnequa Steel Works and its subsequent impact on the city.”

The property is also important for featuring the distinctive characteristics of the Mission architectural style, and is, according to the NRHP nomination, considered one of the best examples of that architectural style in the state. Under both the Existing and Modified Alternatives, the property will continue to convey its association with Pueblo’s industrial development and steel industry and will also continue to convey its architectural significance as the characteristics of the Mission style will not be affected. CDOT continues to support its initial determination that the Existing and Modified Alternatives result in *no adverse effect* to the Minnequa Steel Works Office Complex.

Resolution of Adverse Effects/Mitigation

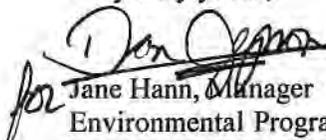
You noted that it is premature to discuss possible mitigation options for adverse effects and cited 36 CFR 800.1(a) which states that the goal of consultation is to “seek ways to avoid, minimize, or mitigate any adverse effects on historic properties.” While we appreciate your perspective, both FHWA and CDOT have spent considerable resources evaluating existing properties, and multiple years studying ways to avoid and minimize impacts to historic properties along this project corridor. In addition, the team has met with community stakeholders to discuss project alternatives. The alternative evaluation process was particularly challenging given the constrained urban environment and the numbers of historic properties on both sides of the highway. This project will be completed in phases and there may be additional opportunities to evaluate measures to avoid or minimize impacts to these resources as the project moves forward. However, we believe it is appropriate to consider mitigation options at this time because given the constrained nature of the corridor, we know there will be effects to historic properties and we hope to develop a mitigation plan in consultation with SHPO and the consulting parties that has a visible and tangible benefit to the City of Pueblo.

Programmatic Agreement

Based on our July 12, 2010 with SHPO and the consulting parties, FHWA and CDOT are developing a Programmatic Agreement that will outline mitigation for the project corridor as well as how Section 106 will be implemented for future phases of this project. We look forward to working with you and the other consulting parties in the development of this agreement.

We welcome your comments and your continued participation in the Section 106 process. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,


for Jane Hann, Manager
Environmental Programs Branch

cc: Lisa Streisfeld, CDOT Region 2
Chris Horn, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 7, 2010

Ms. Corinne Koehler
Bessemer Historical Society
215 Canal Street
Pueblo, CO 81004

SUBJECT: Additional Information Regarding Effects Determinations, CDOT Project IM 0251-156,
New Pueblo Freeway Environmental Impact Statement

Dear Ms. Koehler:

Thank you for your letter dated July 23, 2010 regarding the project referenced above. Responses to your specific comments are provided below.

Bessemer Neighborhood

You expressed concerns about impacts to some of the specific properties located in the Bessemer neighborhood, including Gagliano's, Gus' Place, St. Mary's School and Church, neighborhood parks, the steel mill, and the CF&I Administration buildings. As noted in the report (Table B-5, pp. B-16 to B-17), there are no direct impacts to Gagliano's (SPE4813), Gus' Place (SPE4837), or the Minnequa Steel Works Office Complex (SPE4179). There would be direct impacts to Mineral Palace Park and Benedict Park, and to the former steel mill site under both the Existing and Modified Alternatives, as discussed in more detail in the effects report.

St. Mary's Genealogical Center (SPE588): Your concern about effects to the St. Mary's Genealogical Center was shared by the City of Pueblo Historic Preservation Commission. The St. Mary's property, which is identified as officially eligible for the National Register of Historic Places in the Office of Archaeology and Historic Preservation Compass database, should have been evaluated individually in our March 2010 effects report but was not. The effects report only considered the property as a contributing feature of the Steelworks Suburb District. We apologize for this oversight and are providing an effects determination for the St. Mary's property as an individually eligible property at this time.

As noted in Exhibits 5-50 (p. 5-97) and 5-59 (p. 5-109), and Table B-5(Appendix B, B-14) of the effects report, the Existing Alternative results in no direct impacts to the property, and the Modified Alternative results in the acquisition of land at the northwest corner of the property. The CDOT project team evaluated the Modified Alternative and revised the design to avoid the direct impact to the open land on the property's northwest corner (see attached graphic). Despite these efforts to avoid direct impacts to the property, CDOT has determined that the removal of Benedict Park and the proximity of the Modified Alternative alignment results in an *adverse effect* to the setting, feeling, and association of St. Mary's. CDOT also assessed the effects of the Existing Alternative on the St. Mary's property and has determined that it results in *no adverse effect*. Although a portion of Benedict Park will be acquired, the Existing Alternative alignment still generally follows the footprint of the existing interstate in this location and is actually below grade at Mesa Avenue, where the property is located.

Neighborhood Connectivity

We recognize that construction of the original Pueblo Freeway between 1949 and 1959 severed many of Pueblo's oldest neighborhoods. The original highway alignment was built before there were federal laws in place to evaluate environmental impacts, including effects to historic properties. For this project, CDOT has worked for years to prepare alternatives that reduce impacts to Pueblo's neighborhoods, Mineral Palace Park, the steel mill and other important historic properties along the corridor.

Steel Mill Resources

Your letter identified specific concerns with resources associated with the former steel mill site, including the tunnel closure and the demolition of the blast furnace stacks. Similar concerns about these resources were expressed by the other consulting parties, including the City of Pueblo, the National Trust for Historic Preservation, and Colorado Preservation Incorporated. We will take into account your comments regarding these resources as we move forward. The project will be phased over many years, and there will be opportunities to review these resources again and to consider design options that could minimize impacts to these and other historic resources.

Aesthetics Guidelines

Thank you for your comments regarding the Aesthetics Guidelines. Please keep in mind that the Guidelines have not been formally adopted; rather, they represent possible aesthetic treatments for the corridor and reflect ideas, concepts, and themes collected from different facets of the community, including artists, local businesses, and interested citizens, as well as the City of Pueblo and Pueblo County. You indicated that you were not involved in the development of this document and that some of the concepts included for the Bessemer neighborhood do not conform to the Bessemer Historical Society Master Plan. We want to point out that Section 2.2 of the Aesthetic Guidelines references the June 2009 site renovation master plan developed by the Bessemer Historical Society, and that the ideas outlined for the Bessemer neighborhood are conceptual only. The Aesthetic Guidelines were included in the Section 106 submittal for information purposes only. Once individual construction projects along the corridor are identified, CDOT will evaluate the effects of any proposed aesthetic treatments on historic properties.

Programmatic Agreement

FHWA and CDOT are in the process of developing a Programmatic Agreement (PA) that will outline mitigation for the project corridor as well as how Section 106 will be implemented for future phases of this project. We look forward to working with you and the other consulting parties in the development of this agreement.

Project Necessity

Your response also questioned the necessity of the overall project. I-25 through Pueblo is one of the oldest interstate segments in Colorado. Very few improvements have been made to this segment of highway since it was completed in 1959 and there is evidence to suggest that the highway has reached, and in some cases, exceeded its service life. The I-25 infrastructure is aging and CDOT needs to plan for maintaining and improving the interstate system, which is vital to the City of Pueblo. The interstate provides regional access throughout the state to move people and goods. Two build alternatives and one non-build alternative have been identified and will be documented in more detail in the Draft Environmental Impact Statement (DEIS), which is anticipated for publication in early 2011. Once the draft document is published, the public will have an opportunity to review and provide comments. A formal public hearing will also be held to solicit comments and questions. We encourage you to participate in this process.

We welcome your continued participation in the Section 106 process. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,


for Jane Hann, Manager
Environmental Programs Branch

Enclosures: St. Mary's (5PE588), Graphic—Modified Alternative

cc: Lisa Streisfeld, CDOT Region 2
Chris Horn/Stephanie Gibson, FHWA

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



October 8, 2010

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado/Colorado Historical Society
1560 Broadway, Ste. 400
Denver, CO 80202

SUBJECT: Additional Information, Section 106 Consultation, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Mr. Nichols:

Thank you for your responses dated May 17, 2010 and June 14, 2010 regarding the Determination of Effects Report and the Addendum to that report submitted for your review in April and May 2010, respectively. Responses to your specific comments are outlined below, organized by the date of your written response and the associated property site number. This letter also includes findings from additional consultation efforts with the City of Pueblo, the Bessemer Historical Society, and the Mountains/Plains Office of the National Trust for Historic Preservation.

May 17, 2010 Response—Determination of Effects Report

5PE5050: You indicated there is a discrepancy in the effect determination for this property under the Existing Alternative. On p. 5-51 of the effects report, there is a *no historic properties affected* determination, but the attached spreadsheet indicates a finding of *no adverse effect*. You concur with the *no adverse effect* determination as shown in the spreadsheet. We apologize for the inconsistency in the information. However, given that the property in question is 909 feet from the Interstate improvements and is 202 feet from the proposed Santa Fe Drive Extension, which is already an established transportation facility and will not come any closer to the property or be elevated in this area, we believe that a *no historic properties affected* determination is appropriate, as there will be no direct or indirect effects to the property based on the nearby improvements.

5PE5517 (North Side Neighborhood District): We disagree with your determination that the adverse effect to the Mineral Palace Park (an individually eligible property [5PE586] and a contributing element to the North Side Neighborhood District) results in an adverse effect to the overall district. The North Side district is a sizeable property, consisting of 220 acres that includes an area approximately 5 blocks wide and 7 blocks long. Mineral Palace Park consists of 42.2 acres, or 19 percent of the total acreage of the district. The district is significant under Criterion A for its association with patterns of early urban development, and under Criterion C for its diverse collection of architectural styles that reflect the broad spectrum of housing styles and types developed for more affluent citizens of Pueblo. The residential nature of the neighborhood, as well as its location near the park, is also important. Although the district's period of significance is tied to the development of the park, extending from the early development of the Colorado Mineral Palace in 1890 to the WPA period of the park in 1940, the significance of the district is

not tied solely to the park. There may be some indirect effects to some of the properties along North Main Street as detailed in the March 2010 Effects Report, but the contributing architectural properties, including the five properties within the APE, will not be directly impacted, the layout of the residential neighborhood will be the same, and the relationship of the district's properties to the park will not change. There will be changes to Mineral Palace Park, but it will still be a feature of the neighborhood. Based on these factors, CDOT believes that the cohesiveness of the North Side Neighborhood District will be conveyed despite the changes to the park. We continue to support our initial determination that both build alternatives result in *no adverse effect* to the North Side Neighborhood District.

5PE5519 (Grove District): We disagree with your opinion that the project results in an adverse effect to the Grove District under the Modified Alternative. You indicated that an adverse effect determination is appropriate because two of the district's contributing elements will be demolished. The Grove District is significant under Criterion A for its association with early urban development in Pueblo as well as settlement patterns of ethnic groups in Pueblo. Under Criterion C, the district is significant for its intact examples of residential and commercial buildings dating from the late 19th and early to mid-20th century. According to the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, "a district derives its importance from being a unified entity, even though it is composed of a wide variety of resources." Under the Modified Alternative, all but two of the district's variety of resources will remain intact, including the significant commercial and residential buildings. The two buildings that will be demolished (5PE4680 and 5PE4681) are located on the far southeast edge of the district adjacent to Santa Fe Avenue and their removal will not affect the overall cohesiveness of the Grove District or its ability to convey its significance under NRHP Criteria A and C. CDOT maintains that the Modified Alternative will result in *no adverse effect* to the proposed Grove district.

June 14, 2010 Response—Addendum to Determination of Effects Report

5PE1776 (Union Pacific Railroad): We disagree with your comment that there is an adverse effect to the railroad under the Modified Alternative based on the destruction of a segment of the UPRR spur (5PE1776.16). The overall spur is 2,120 feet long. The piece of this resource that will be removed consists of 325 feet that has compromised integrity compared to the remainder of the segment. As we indicated in our May 27, 2010 submittal, the section of spur that will be impacted no longer has rails or ties and extends into an area of vegetative overgrowth. Had we documented this section of the spur separately from the remainder of the spur, we would have determined that this piece of the spur lacks integrity. However, given that we are working to better represent and evaluate linear resources by documenting contiguous segments vs. smaller separate segments, we often evaluate longer segments where most of the resource retains integrity and a small portion does not. Despite the loss of this 325-foot section of the spur, the majority of the segment that retains integrity will still convey the significance of the spur and the overall railroad. Based on this, we maintain that our initial determination of *no adverse effect* is appropriate. We believe this is an issue of how the property was identified and documented and welcome your suggestions for how to address this type of resource in the future.

5PE5042 (Newton Lumber): You asked for additional clarification regarding the integrity of the railroad spur extending into the Newton Lumber property. In our May 2010 Addendum Report, we indicated that the eastern portion of the spur that extends between the Newton Lumber buildings retains a high degree of integrity and the western portion of the spur that was included in the boundary of the property has poor integrity due to lack of materials and abandonment. In our May 2010 consultation, we proposed revising the boundary of the Newton Lumber Company site to include the western portion of the spur that exhibits poor integrity. Under the Existing Alternative, only 46 feet of the overall 660-foot spur will be included in CDOT ROW and likely removed. The entire 600-foot segment of the spur that was initially

documented with the Newton Lumber Company site will remain intact. Under the Modified Alternative, a 122-foot segment of the spur will be impacted, leaving intact 538 feet of the overall spur that extends between the contributing buildings on the Newton Lumber property. The 122-foot portion includes 62-feet of the 600-foot segment that retains integrity. The spur was included in the boundary to document its historic association with the lumber company property and the physical continuity of the remaining resource. However, the western end of the spur—approximately 60 feet—has low integrity compared to the 600-foot segment that was originally identified. Despite the loss of small sections of the spur under the two alternatives, CDOT still maintains that the Existing and the Modified Alternatives result in *no adverse effect* to the overall Newton Lumber Company property. The Newton Lumber Company property can still convey its significance as an example of 20th Century industrial architecture. The remaining portion of the spur will maintain its relationship and association with the lumber company buildings, and the buildings will stay intact.

Additional Consultation

Based on comments from the City of Pueblo, the Bessemer Historical Society, and the Mountains/Plains Office of the National Trust, CDOT provides the following responses for your review and concurrence regarding effects to two properties within the project APE: St Mary's Genealogical Center (SPE588) and the Minnequa Works Office Complex (SPE4179).

St. Mary's Genealogical Center (SPE588): The St. Mary's property, which is identified as officially eligible in the Office of Archaeology and Historic Preservation Compass database, should have been evaluated individually in our March 2010 effects report but was not. The effects report only considered the property as a contributing element of the Steelworks Suburb. We apologize for this oversight and at this time are providing an effects determination for the St. Mary's property as individually eligible. As noted in Exhibits 5-50 (p. 5-97) and 5-59 (p. 5-109) and Table B-5 (Appendix B, B-14) of the effects report, the Existing Alternative results in no direct impacts to the property, and the Modified Alternative results in the acquisition of a piece of open land on the northwest corner of the property. The CDOT project team evaluated the Modified Alternative and revised the design to avoid the direct impact to the property's northwest corner (see attached graphic). However, CDOT has determined that the removal of Benedict Park and the proximity of the Modified Alternative alignment results in an *adverse effect* to the setting, feeling, and association of St. Mary's. CDOT also assessed the effect of the Existing Alternative on the St. Mary's property and has determined that it results in *no adverse effect*. Although a portion of the adjacent Benedict Park will be acquired, the Existing Alternative alignment still generally follows the footprint of the existing interstate in this location and is actually below grade at Mesa Avenue, where the property is located.

Minnequa Steel Works Office Complex (SPE4179): We would like to clarify an error in the text regarding the Minnequa Steel works Office Complex. On pages 5-102 and 5-111 of the effects report, CDOT indicated that the Minnequa Steel Works Office Complex (SPE4179) was adversely affected by both alternatives. The *no adverse effect* finding of the office complex as provided on pages 6-11 through 6-16 is the correct effect determination for this property.

The Mountains/Plains Office of the National Trust disagreed with CDOT's determination that there is *no adverse effect* to the Minnequa Steel Works Office Complex based on the Existing and Modified Alternatives, stating that the character defining features of the property will be altered by some of the same impacts that CDOT determined result in an adverse effect to the overall Steelworks Suburb District (SPE5523) (of which the office complex is a contributing feature). CDOT disagrees with this assessment. The property at SPE4179 is indirectly impacted by the elevation of the roadway in this area, the change in tunnel access, impacts to structures on the steel mill property, and changes in noise levels, but these

effects do not diminish the integrity of the property. The office complex and its immediate setting will remain intact and will still convey significance under both Criteria A and C. Association with the steel mill is part of what makes the individual office complex significant but the 2002 National Register of Historic Places (NRHP) nomination for SPE4179 highlights the significance of the separate office complex property, noting that:

“Although the plant’s industrial operations are located nearby, separated from the Office Complex by Interstate 25, these facilities have undergone substantial changes over the years, prompted by technological advances and the widening of the highway. Therefore the complex of administrative buildings best represents Minnequa Steel Works and its subsequent impact on the city.”

The property is also important for featuring the distinctive characteristics of the Mission architectural style, and is, according to the NRHP nomination, considered one of the best examples of that architectural style in the state. Under both the Existing and Modified Alternatives, the property will continue to convey its association with Pueblo’s industrial development and the steel industry and will also continue to convey its architectural significance as the characteristics of the Mission style will not be affected. CDOT continues to support its initial determination that the Existing and Modified Alternatives result in *no adverse effect* to the Minnequa Steel Works Office Complex.

Programmatic Agreement

Based on our July 12, 2010 meeting with your staff and the consulting parties, FHWA and CDOT are developing a Programmatic Agreement that will outline mitigation for the project corridor as well as how Section 106 will be implemented for future phases of the project. We look forward to working with you and the consulting parties in the development of this agreement.

We request your concurrence with these findings. Your response is necessary for the Federal Highway Administration’s compliance with Section 106 of the National Historic Preservation Act, and the Advisory Council on Historic Preservation’s regulations. If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

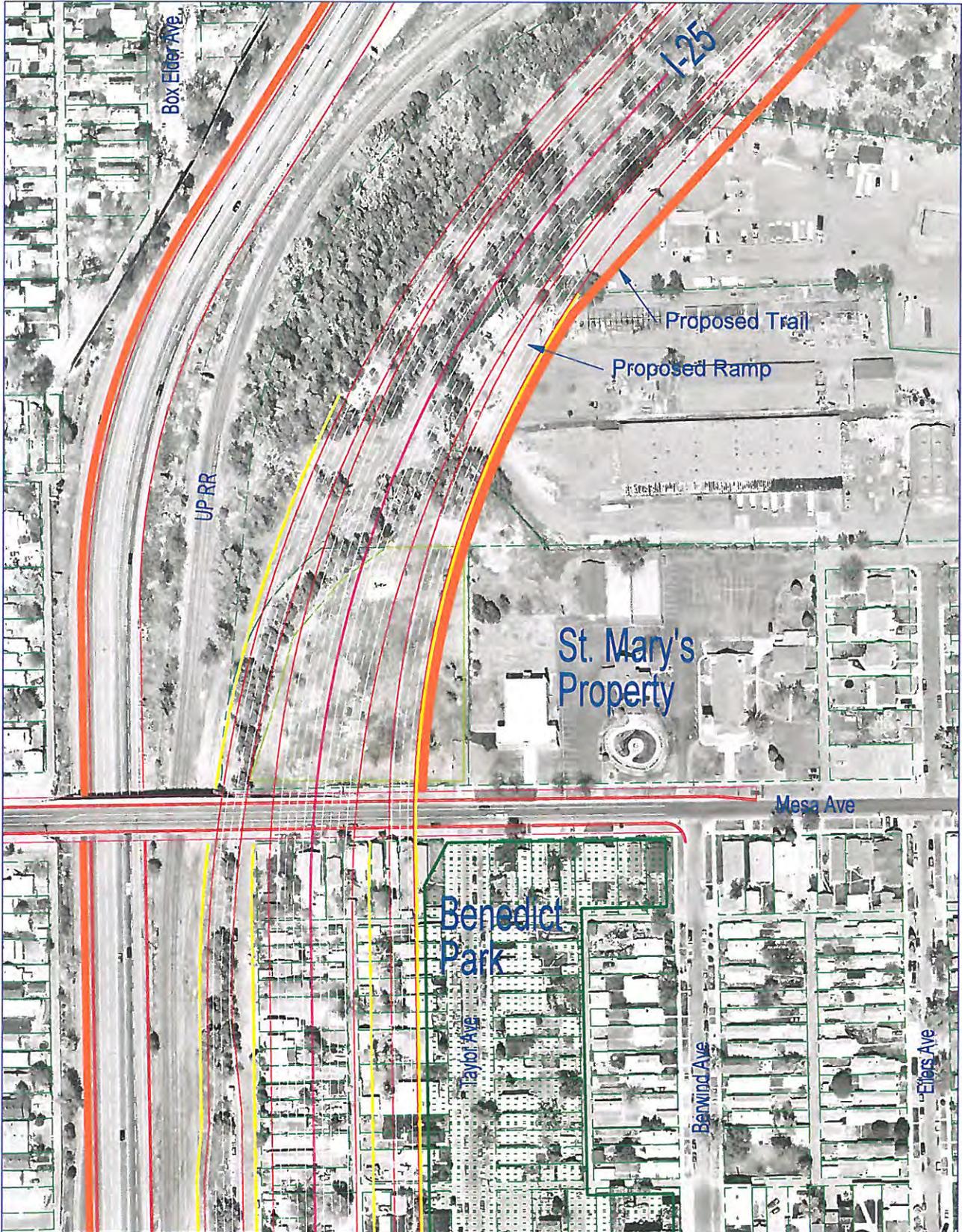
Very truly yours,


for Jane Hann, Manager
Environmental Programs Branch

Enclosures:

St. Mary’s (SPE588), Graphic—Modified Alternative

cc: Lisa Streisfeld, CDOT Region 2
Chris Horn, FHWA



PROPOSED DESIGN CHANGE TO AVOID SAINT MARY'S PROPERTY





HISTORY *Colorado*
October 21, 2010

Jane Hann
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Additional Information, Section 106 Consultation, CDOT Project IM 0251-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

Dear Ms. Hann,

Thank you for your correspondence dated October 8, 2010 and received by our office on October 12, 2010 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

Resource 5PE.5050

Thank you for the clarification in regards to the finding of effect. We concur with the recommended finding of no historic properties affected [36 CFR 800.4(d)(1)] for this property.

Resources 5PE.5517 and 5PE.5519

Thank you for the additional information regarding these resources, however, we still believe that a finding of adverse effect [36 CFR 800.5(a)(1)] would be appropriate for these resources. Contributing elements within these eligible historic districts would be demolished as a result of the project. While the historic districts may still be able to convey significance, the historic integrity would be diminished by the loss of character-defining features. As stipulated in 36 CFR 800.5(a)(1): "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association..." In our opinion, the demolition of contributing elements within eligible historic districts diminishes the integrity of those historic districts and would result in an adverse effect.

Resource 5PE.1776

In previous projects, we have evaluated effects to linear resources based on whether or not the segment retains integrity and supports the overall eligibility of the entire linear resource. Often, these projects included intersection improvements, extension of bridges or culverts, or bridge replacements. Typically, the linear resource is being altered, but remains intact. In the case of the surveyed segment 5PE.1776.16, a 325-foot section of the segment will be demolished. The resource most likely still convey its significance, but the historic integrity of location, setting, feeling, and association would be diminished by the actual demolition of a section of an eligible property [see 36 CFR 800.5(a)(1)]. In our opinion, demolishing 325 feet of a historic property is an adverse effect, as stipulated in 36 CFR 800.5(a)(2)(i).

Resource 5PE.5042

In previous projects, we have evaluated effects to linear resources based on whether or not the segment retains integrity and supports the overall eligibility of the entire linear resource. Often, these projects included intersection improvements, extension of bridges or culverts, or bridge replacements. Typically, the linear resource is being altered, but remains intact. In the case of the surveyed segments for resource 5PE.5042, various segments would be fully demolished. The resource most likely still convey its significance, but the historic integrity of location, setting, feeling, and association would be diminished by the actual demolition of a section of an eligible property [see 36 CFR 800.5(a)(1)]. In our opinion, demolishing 325 feet of a historic property is an adverse effect, as stipulated in 36 CFR 800.5(a)(2)(i).

Resource 5PE.588

We concur with the recommended finding of adverse effect [36 CFR 800.5(a)(1)] for the Modified Alignment and no adverse effect [36 CFR 800.5(b)] for the Existing Alignment. We continue to concur with the overall finding of adverse effect for the Steelworks Suburbs Historic District, in which resource 5PE.588 is located.

Resource 5PE.4179

After review of the provided information, we concur with the recommended finding of no adverse effect [36 CFR 800.5(b)] for resource 5PE.4179. We continue to concur with the overall finding of adverse effect for the Steelworks Suburbs Historic District, in which resource 5PE.4179 is located.

We recommend that CDOT and FHWA request comments from the Advisory Council on Historic Preservation under 36 CFR 800.5(c)(2)(i) to resolve the disagreements with the findings of effect.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



Edward C. Nichols
State Historic Preservation Officer

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9281



December 2, 2010

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado/Colorado Historical Society
1560 Broadway, Ste. 400
Denver, CO 80202

SUBJECT: Section 106 Comments and Section 4(f) *De Minimis* Notification, CDOT Project IM 2021-156, New Pueblo Freeway Environmental Impact Statement (CHS #44746)

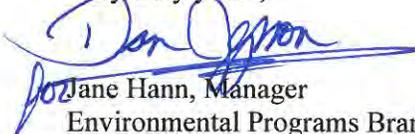
Dear Mr. Nichols:

Thank you for your response dated October 21, 2010 regarding the additional consultation on effect determinations for select properties associated with the project referenced above. As a result of that consultation, your office recommended that CDOT and FHWA request comments from the Advisory Council on Historic Preservation regarding the disagreement on effect determinations, specifically for the North Side Neighborhood District (5EP5517), and the Grove District (5EP5519). FHWA consulted with the ACHP and has been advised that the removal of contributing features to a historic district would constitute an *adverse effect* as defined in 36 CFR 800.5. Per the ACHP guidance, FHWA and CDOT will not pursue additional consultation efforts regarding this issue, and *adverse effect* determinations will be applied to the Grove District under the Modified Alternative and to the North Side Neighborhood District under both the Existing and Modified Alternatives. CDOT also agrees with your comments regarding the effects determinations for additional properties noted in your October 21, 2010 correspondence: 5PE1776, 5PE5042, 5PE588, and 5PE4179.

This correspondence is also a notification that FHWA may make a *de minimis* finding for the Section 4(f) requirements for property 5PE5080, located at 200 and 210 South Santa Fe in Pueblo. FHWA and CDOT determined that the Existing and Modified Alternatives result in *no adverse effect* to this property, in consultation with your office. You concurred with this determination in correspondence dated May 17, 2010. The effects determination for the property was described on pp. 5-54 to 5-55 of the March 2010 Determination of Effects report. We request your acknowledgement of the Section 4(f) *de minimis* notification.

If you require additional information, please contact CDOT Senior Staff Historian Lisa Schoch at (303)512-4258.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

cc: Lisa Streisfeld, CDOT Region 2
Chris Horn, FHWA

Tribal Consultation

FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: I-25/Pueblo Freeway Environmental Impact Statement

The Kiowa Tribe of Oklahoma Tribe [~~is~~ is not] (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below.

Signed:

P. H. Ken Bering Vice-Chair
Name and Title

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes No If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes No If yes, please explain.

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes No If yes, please explain.

Please complete and return this form via US Mail or fax to:

Dan Jepson, Section 106 Native American Liaison
Colorado Department of Transportation
Environmental Programs
4201 E. Arkansas Ave.
Denver, CO 80222
FAX: (303)757-9445

Section 4(f) Correspondence

Creighton Wright
Director of Parks & Recreation



800 Goodnight Avenue
Pueblo, CO 81005

Mike Sexton
Assistant Director
Parks & Recreation

Phone: (719) 553-2790
Fax: (719) 553-2791
email: parks@pueblo.us
www.puebloparks.us

Parks & Recreation

July 13, 2010

Rich Zamora,
Colorado Department of Transportation
1019 Erie Ave
Pueblo, CO 81002

SUBJECT: Pueblo I-25 Freeway Letter for EIS

Dear Mr. Zamora,

The new Pueblo I-25 Freeway project will be a major asset for the City of Pueblo and the rest of southern Colorado. It provides badly needed improvements to the vehicular transit system for the City of Pueblo and the region. It also provides for awesome opportunities to develop regional multimodal trail system and recreation amenities via mitigation due to the freeway expansion.

As you may know, I became Parks and Recreation Director for the City of Pueblo in September 2009. This is far after the major planning effort for the new Pueblo I-25 Freeway had ended. I have studied the plans extensively, met with the landscape design team and spoke with some of the staff that were involved in the project. This document identifies concerns/challenges, proposed solutions and my preferences for the ultimate design based on the most advantageous multimodal trail system and recreation amenity development. Other than a preferred alignment, this does not relate to the vehicular transit system.

While I would have pushed for many design changes due to my own past experience had I participated in the design, I will not ask for wholesale changes, but rather will identify less significant challenges that will need to be addressed as the formal design process begins. With this in mind, it is critically important that someone from the Pueblo Parks and Recreation formally participate in the design and construction process to ensure an understanding of the design, allow time to prepare for changes and ensure city standards are followed and accommodated.

ALIGNMENT

1. MODIFIED ALIGNMENT PREFERRED – HIGH IMPORTANCE

Due largely to the opportunity to create significant trail connectivity and linkages, I prefer the modified alignment. The modified alignment provides significantly more trail opportunities and provides critical north/south connectivity that doesn't currently exist.

TRAIL CONCERNS WITH THE MODIFIED ALIGNMENT

1. While the modified alignment is preferred, it doesn't provide the necessary detail to understand the design intent. The concerns with trails has mostly to do with the connections and the expected crossing method. Oftentimes, trails die because the connectivity isn't considered early

enough in the project. There are several places where the proposed trail crosses the railroad, on/off ramps to the freeway, pedestrian bridge, and Northern Avenue. Finally, it is critical to ensure connectivity to other regional amenities adjacent to the freeway project, i.e. Arkansas River, and Runyon Lake.

FOUNTAIN CREEK GREENWAY PLAN/RUNYON LAKE MASTERPLAN

1. The City will be adding to the scope of the Fountain Creek Greenway Plan and including areas around Runyon Lake, connections to HARP, Runyon Park, and the area between Runyon Park/Lake and I-25. If CDOT plans to purchase existing houses in this area, the City would be interested in taking control of this space and planning for recreation amenity development, turning the area into a regional draw.

MINERAL PALACE PARK

1. MAINTENANCE YARD – HIGH IMPORTANCE

The Maintenance Yard at Mineral Palace Park represents approximately half the City's park maintenance needs and therefore must not be inoperable for any length of time. It should be one of the first items replaced, and not taken out of commission until after a new yard has been constructed.

The planned new location of the yard is problematic. It is currently two blocks from the highly intense uses at the park. The yard needs to be more centrally located to the park.

2. POOL – MEDIUM IMPORTANCE

There has been recent discussion about possibly putting an aquatics complex in downtown and closing the pool at Mineral Palace Park. This project would be the time to make that change. Perhaps the money for mitigation could be contributed to this ultimate location.

3. PARKING – MEDIUM IMPORTANCE

In its current design the park is severely underparked. If the park were redesigned, additional parking needs should be accommodated.

Again, the I-25, New Pueblo Freeway, is badly needed to improve the transit system for Pueblo and all of Southern Colorado. This project will not only develop the transit system but will assist in the development of a multimodal regional trail system and recreation amenities for the City of Pueblo and surrounding area.

Please feel free to contact me with any questions or comments about the abovementioned requests. I am excited about the development of the transportation system and improvements to the trails and recreation system.

Sincerely,

Creighton Wright
Director

LEDPA Concurrence Coordination



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

October 6, 2010

12300 W. Dakota Ave., Suite 180
Lakewood, Colorado 80228
720-963-3000
Fax 720-963-3001

Allan Steinle
Chief, Regulatory Division
Department of the Army
Corps of Engineers, Albuquerque District
4101 Jefferson Plaza NE
Albuquerque, New Mexico 87109-3435

Subject: I-25 New Pueblo Freeway LEDPA concurrence request

Dear Mr. Steinle:

The Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) are preparing a Draft Environmental Impact Statement (DEIS) for I-25 through Pueblo, CO. There are two build alternatives and one no build that are evaluated in the DEIS. We are working towards identifying the Modified I-25 Alternative as the preferred alternative in the DEIS because it: better serves the project's purpose and need, has fewer impacts to properties in the Historic Steelworks Suburbs (69 vs. 86), allows for better mitigation to impacts to Benedict Park, and appears to be the Section 4(f) least harm alternative. Although this alternative has more impacts to wetlands (1.10 acres vs. 0.22 acres for the existing Alignment Alternative) we consider this to be the Least Environmentally Damaging Practicable Alternative (LEDPA) for the above reasons and as further detailed in the attached "I-25 New Pueblo Freeway: Preferred Alternative Decision Process" document. The enclosed document also describes some of the considerable effort we have taken in refining the alternatives in an effort to reduce impacts to wetlands to the maximum extent possible throughout the project.

At this time we are requesting concurrence from the Corp of Engineers (USACE) that the Modified Alignment for the I-25 New Pueblo Freeway project is the LEDPA. If you have any questions please contact Mr. Chris Horn of my office at (720) 963-3017.

Sincerely Yours,

John M. Cater
John M. Cater
Division Administrator



Enclosure

Cc: Van Truan, USACE,
Lisa Streisfeld, CDOT Region 2

I-25 New Pueblo Freeway: Preferred Alternative Decision Process

Executive Summary

The Colorado Department of Transportation (CDOT), in coordination with the Federal Highway Administration (FHWA), is preparing an Environmental Impact Statement (EIS) for the New Pueblo Freeway, which is a 7-mile stretch of I-25 through the City of Pueblo. Interstate 25 (I-25) is a north-south highway that extends from the border of Mexico to Wyoming. The route serves as a strategic international corridor under the North American Free Trade Act and as an economic lifeline for the city of Pueblo (see Exhibit 1).

Through Pueblo, I-25 is among the oldest segments of the interstate system in Colorado. Few improvements have been made to this segment of I-25 since it became operational in 1959. There is evidence that this stretch of highway has now reached, and in some cases exceeded, its service life.

While a number of alternatives were considered during the development of this project, the alternatives screening process (conducted in conjunction with resource agencies, local government representatives, and public input) eliminated all but two action alternatives: the Existing I-25 Alternative and the Modified I-25 Alternative. These two alternatives have been carried through the detailed impact assessment that will be documented in the Draft EIS (DEIS), which is scheduled for publication in late 2010 or early 2011.

While both alternatives are carried through the DEIS and impacts of each are discussed within the document, CDOT and FHWA would like to identify a Preferred Alternative in the DEIS. Identifying a Preferred Alternative in the DEIS is dependent upon complying with sections of two federal laws in particular: Section 404 of the Clean Water Act (CWA) and Section 4(f) of the United States (US) U.S. Department of Transportation (US DOT) Act of 1966.

Based on a careful analysis of the project's impacts and considering the requirements of the regulations implementing Section 404 and Section 4(f), it is recommended the Modified I-25 Alternative be identified as the preferred alternative, because it better serves the project's purpose and need. Although this alternative has more impacts to wetlands, the impacts can be mitigated. Additionally under this alternative, measures to minimize harm were carefully considered; subsequently, the uses to the Section 4(f) recreational properties can also be minimized, mitigated, and/or replaced. This memo documents the rationale behind this recommendation.

Regulatory Framework: Section 4(f) and Section 404

The regulations implementing Section 4(f) of the US DOT Act of 1966 and the Section 404 of the CWA provide guidance for evaluating potential impacts to the resources they protect. On occasion, the requirements of Section 404 and Section 4(f) may point toward different project alternatives as preferable for avoiding and minimizing impacts to resources. To highlight the goals and processes of these laws, a brief summary follows.

Section 404 of the Clean Water Act

Waters of the US, including wetlands, are regulated by the US Army Corps of Engineers (USACE) under Section 404 of the CWA. For CDOT projects, Section 404 requires that 1) impacts to wetlands be avoided or minimized to the extent practicable and 2) CDOT obtain a permit from the USACE before discharging fill into waters of the US. Section 404 also requires that unavoidable impacts to wetlands be minimized and mitigated through preservation, restoration, wetland banking, or creation of additional wetland acreage. Additionally, the CWA Section 404 (b)(1) guidelines require that the Preferred Alternative selected be the least environmentally damaging practicable alternative (LEDPA), the practicable alternative that results in a proposed discharge that would have the least adverse effect on the aquatic environment.

In addition to the Section 404 regulations, Presidential Executive Order (EO) 11990 "Protection of Wetlands," requires that federal agencies avoid, to the extent practicable, both long-term and short-term adverse impacts associated with the destruction or modification of wetlands. More specifically, the EO directs federal agencies to avoid construction in wetlands unless there is no reasonable alternative, and states that where wetlands cannot be avoided, the proposed action must include all practicable measures to minimize impacts to wetlands.

Section 4(f) of the US DOT Act of 1966

Section 4(f) stipulates that FHWA and other Department of Transportation agencies can not approve the use of land from publicly owned parks or recreational areas, wildlife or waterfowl refuges, or public or private historical sites unless the following conditions apply:

- A determination is made that there is no feasible and prudent alternative to the use of land from the property, and the action includes all possible planning to minimize harm to the property resulting from such use, or
- The use of property, including any measures to minimize harm, will have a *de minimis* impact on the property.

Section 4(f) legislation requires the selection of an alternative that avoids the use of Section 4(f) property, if that alternative is deemed feasible and prudent. The Section 4(f) regulation states that, if there is no feasible and prudent alternative that avoids use of Section 4(f) properties, FHWA "may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose." (23 Code of Federal Regulations [CFR] 774)

Project 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 of Pueblo to meet existing and future travel demands.

Construction of I-25 through Pueblo began in 1949 and was completed in 1959. The roadway was constructed before the interstate system and its associated design guidelines had been created. As a result of its age and the design practices of the time at which it was built, this section of I-25 through Pueblo contains structural and operational deficiencies. These

deficiencies are becoming apparent through current transportation problems that can be grouped as follows:

- **Safety problems.** This section of I-25 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 to safely merge with highway traffic.
- **Mobility problems.** In this section of I-25, there are interchanges that do not connect to appropriate city streets (connect to local neighborhood streets rather than major arterial streets); areas of reduced speed; segments with congestion and a poor level of service; aging bridges with inadequate bridge sufficiency ratings; and conflicts with local and regional travel.

Interstate 25 is an aging facility with short, steep on and off ramps, tight curves, and little or no shoulders for emergency stopping. The highway engineers in the 1950s designed the freeway to serve transportation needs through the year 1975.

The demands of twenty-first century travel manifest in high accident rates along this stretch of I-25. The accident rates are a result of the combination of traffic volumes, increasing speeds, and inadequate geometric features (such as tight curves, inadequate stopping sight distance, narrow shoulders, and close ramp spacing). Furthermore, the on and off ramp deficiencies and high usage intensify the accident rates at and near interchanges.

As exemplified by the need to improve mobility, also of concern to local residents is the fragmentation of neighborhoods and communities that occurred with the original construction of I-25. Reestablishing connectivity between fragmented areas goes hand-in-hand with improving mobility on the local system. In turn, improved mobility on the local system will reduce the need for residents to use I-25 for the purposes of local trips.

Alternatives Investigated

The Existing I-25 Alternative, the Modified I-25 Alternative, and a No Action Alternative have been identified and are evaluated in the DEIS prepared for the project. These alternatives are described below.

No Action Alternative

The No Action Alternative includes minor maintenance, repair, and safety improvements throughout the Pueblo region that are currently included in the Pueblo Area Council of Government's (PACOG) *2035 Regional Transportation Plan*. The No Action Alternative fails to address documented safety problems on I-25 (including accident rates that exceed statewide averages). It does not provide the additional capacity on I-25 to accommodate existing and future travel demands and both regional and local trips. It maintains interchanges that do not connect to major arterial streets; maintains inappropriate connections to local neighborhood streets, areas of reduced speed, congested segments, a poor level of service, aging bridges with inadequate bridge sufficiency ratings; and conflicts with local and regional travel. It fails to address poor roadway geometry on I-25, including narrow lanes, narrow shoulders that do not accommodate broken-down vehicles, ramps with inadequate

lengths to maneuver vehicles, and inadequate spacing of interchanges. However, the No Action Alternative would not impact any Section 4(f) properties or jurisdictional wetlands.

Build Alternatives

Two build alternatives have been identified during the course of the I-25 study, the Existing I-25 Alternative and the Modified I-25 Alternative. Both alternatives would:

- Widen the highway from four lanes to six lanes (three in each direction) between approximately 29th Street and Pueblo Boulevard and would reconstruct five interchanges;
- Extend Dillon Drive on the west side of Fountain Creek from 26th Street to US Highway 50B;
- Reconfigure the downtown interchanges between 13th Street and 1st Street to be a split diamond configuration with one-way frontage roads between the ramps; and
- Improve east-west mobility by providing a split diamond interchange between Abriendo and Northern Avenues and reconnect Abriendo Avenue to Santa Fe Drive/US 50C. Doing this would reestablish the east-west link that was lost when I-25 was constructed in the 1950s.

The differences between the alternatives are discussed in the following paragraphs.

Existing I-25 Alternative

The Existing I-25 Alternative includes the improvements described above while following the existing alignment. To accommodate the improvements to I-25, the Union Pacific Railroad would be moved to the east between the Arkansas River and Evraz Rocky Mountain Steel Mill (see Exhibit 2).

Modified I-25 Alternative

The Modified I-25 Alternative includes the improvements described in the bullets above as well as incorporates alignment changes in the central area of the project. Under the Modified I-25 Alternative, I-25 would leave its existing alignment and be relocated to the east, approximately between Ilex Street on the north and just south of the entrance to the Evraz Rocky Mountain Steel Mills. At this southern location, the highway would rejoin the existing alignment through the rest of the project. The roadway that would no longer be I-25 would be reused to provide an extension of the existing Santa Fe Avenue. This means that residents living south and north of the Arkansas River would have direct access to southern or northern Pueblo without having to drive on I-25 (see Exhibit 3).

A new Stanton Avenue would run east from Santa Fe Avenue, go under I-25, and turn south at Runyon Field. The road would continue south over the Arkansas River, intersect with Santa Fe Drive, and connect to the existing Santa Fe Avenue. This new configuration would allow Locust Street to be connected to B Street, west of Santa Fe Avenue. This request came from the East Bessemer neighborhood. Residents were extremely concerned about the neighborhood losing direct access from downtown (see Exhibit 4) as result of this project.

Table 1 below illustrates a comparison of the two Build Alternatives.

TABLE 1
Summary of Impacts to Transportation

Existing I-25 Alternative	Modified I-25 Alternative
	Corrects geometric and operational deficiencies.
	Replaces 15 bridges that have low sufficiency ratings.
	Extends Dillon Drive to increase off-highway mobility for local users.
	Reconstructs interchanges at US 50B and between 1st Street and 13th Street to improve ramp length, mobility, and safety by connecting I-25 to more appropriate city streets.
	Modifies transit routes by reconfiguring interchange systems.
	Improves east-west connectivity through reconstruction of the Abriendo Avenue and Northern Avenue interchange complex.
Reconstruction of the Abriendo Avenue interchange and removal of the Ilex Street interchange improves safety by increasing spacing between interchanges.	Restores off-highway connections that were removed during original I-25 construction. Extension of Santa Fe Avenue and Stanton Avenues to re-establish 23 miles of local grid system and improves safety and mobility.
Relocates existing railroad tracks to the east to accommodate for wider highway footprint.	Provides alternative north-south routes for local users.
Improves off-highway mobility for local users by construction frontage road system at Northern Avenue.	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.

Source: New Pueblo Freeway Project Team, 2010.

Resource Study Background

A comprehensive investigation of social, natural, and cultural resources was completed as part of the project. These resources and potential impacts to them will be documented in the Draft and Final EISs being prepared for this project. As this memorandum is concerned with the regulatory requirements of Section 404 and Section 4(f), a summary of the wetlands and Section 4(f) resources in the study area is presented below.

Wetlands and other Waters of the US

A field survey of the project area was conducted in 2003 to verify the presence or absence of potential wetland areas. Wetlands in the project area were identified and boundaries were delineated using the procedures in the USACE *Wetlands Delineation Manual* (USACE, 1987). In addition, CDOT performed a functional assessment for all wetland areas in May 2010. A total of seven wetland areas (WL-1 through WL-4 and WL-5a, 5b, and 5c) and three waters of the US (the Arkansas River, Fountain Creek, and Runyon Lake) were identified during the field survey (see Table 2 below). The wetland areas are primarily concentrated along the Arkansas River and Fountain Creek corridors and total 13.85 acres within the project area.

TABLE 2
Wetlands and Waters of the U.S. within the Project Area

Location	Cowardin Classification System ¹	Acreage within Project Area
WL-1	PEM/PFO	4.04
WL-2	PEM/PFO	1.06
WL-3	PSS/PFO	0.39
WL-4	PEM	010
WL-5a	PSS/PFO	1.80
WL-5b	PEM/PFO	4.35
WL-5c	PEM	2.11
Arkansas River	Riverine	9.06
Fountain Creek	Riverine	25.76
Runyon Lake	Riverine	2.42

¹ The wetland areas were categorized by the Cowardin Classification System as follows:

Palustrine Emergent (PEM) - Characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years. These wetlands are usually dominated by perennial plants. All water regimes are included except subtidal and irregularly exposed.

Palustrine Scrub Shrub (PSS) - Includes wetland areas dominated by woody vegetation less than 6 meters (20 feet) tall. The species include true shrubs, young trees, and trees or shrubs that are small or stunted because of environmental conditions. All water regimes except subtidal are included.

Palustrine Forested (PFO) - Similar to the PSS Classification however; the PFO Classification is characterized by woody vegetation that is 6 meters tall or taller.

Riverine - Includes all wetlands and deepwater habitats contained within a channel with the exception of wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens; and habitats with water containing ocean-derived salts in excess of 0.5 percent.

The wetlands and the waters of the U.S. are shown in Exhibits 5 through 8.

Wetland 2 (WL-2), the wetland impacted more by the Modified I-25 Alternative than by the Existing I-25 Alternative, was assessed using CDOT's Functional Assessment of Colorado Wetlands (FACWet) as part of this analysis. While this wetland in terms of habitat connectivity and buffer capacity was determined to be functioning impaired it received a composite FCI (Functional Capacity Index) score of 0.82 out of 1.00. This relatively high score was due to the fact that this wetland is still highly functioning in terms of water storage, nutrient/toxicant removal, flood attenuation, and supporting aquatic habitat. Weed species only constituted a minor portion of the wetland vegetation.

Other wetlands within the study area were examined with scores slightly to moderately lower to that of WL-2. WL-1 had a composite FCI score of 0.76, which was the lowest of the assessed wetlands.

Section 4(f) Resources

The study area for the New Pueblo Freeway project includes the following parks and recreational facilities, from north to south:

- Detention Ponds between 29th Street and 24th Street (Pits Park), adjacent to I-25
- Mineral Palace Park between 15th and 19th Street, adjacent to I-25
- Fountain Creek Park Land and Trail east of I-25, follows Fountain Creek
- Runyon Field Sports Complex at Ilex east of I-25
- Runyon/Fountain Lakes State Wildlife Area along Arkansas River east of I-25
- The Arkansas River Corridor
- Benedict Park at Mesa Avenue east of I-25
- JJ Raigoza Park at Maryland Avenue west of I-25

All of the parks are owned by the City of Pueblo with the exception of the Runyon/Fountain Lakes State Wildlife Area, which is owned by the Pueblo Conservancy District and operated and maintained by the Colorado Division of Wildlife.

A total of 882 historic resources were surveyed for the project. Of the 882 historic resources surveyed (876 individual properties and six neighborhoods) for eligibility, 191 individual properties and five historic neighborhoods were recommended for eligibility. The State Historic Preservation Officer (SHPO) concurred with these findings in April 2009. These resources include such things as private residences and commercial buildings generally constructed between 1900 and 1960, the Santa Fe Avenue Bridge over the Arkansas River, the 4.5-mile Colorado & Wyoming railroad switching line, the late 19th century retaining walls at the Colorado Smelting Company, and the Steelworks Suburbs Historic District. The Steelworks Suburbs Historic District contains several neighborhoods and the steel mill itself. Many of these properties are National Register of Historic Places-eligible based on their association with patterns of early urban development in Pueblo or because they are good examples of historic architectural styles.

Impacts, Avoidance, Minimization, and Mitigation of Impacts to Wetlands and Section 4(f) Resources

Wetlands and Waters of the US

Because the Existing I-25 Alternative and Modified I-25 Alternatives follow the same alignment in the northern and southern areas of the project, the central area of the project is the differentiator among impacts. Both alternatives would impact 0.13 acre of WL-5c in the north area of the project and 0.02 acre of WL-1 in the south area.

Existing I-25 Alternative

The Existing I-25 Alternative would impact a total of 0.22 acre of wetlands in the project area. In the Central area of the project, the Existing I-25 Alternative would impact a total of 0.07 acre of WL-2, which would be fragmented and divided in half. Impacts would occur due to the extension of Abriendo Avenue to connect to Santa Fe Drive east of I-25. The bridge piers currently in place at the Arkansas River crossing would be removed and replaced; however, they would be reconstructed in the same locations as the existing piers with a slightly smaller footprint. As a result, no direct permanent impacts to the Arkansas River would occur.

Modified I-25 Alternative

The Modified I-25 Alternative would impact 1.10 acres of wetlands. The Modified I-25 Alternative would have a total of 0.95 acre of unavoidable impacts to Central area wetlands, consisting of 0.93 acre of impacts to WL-2 and 0.02 acre of impacts to the Arkansas River. Specifically, the Modified I-25 Alternative would almost entirely remove WL-2 to accommodate the realignment of I-25. Impacts to the Arkansas River would occur due to the placement of bridge piers in the Arkansas River. Table 3 provides a summary of impacts to the wetlands.

TABLE 3
Summary of Impacts to Wetlands

Existing I-25 Alternative	Modified I-25 Alternative
Construction of the Dillon Drive extension near US 50 would impact 0.13 acre of WL-5c.	
Construction of the Greenhorn Drive extension would impact 0.02 acre of WL-1.	
Extension of Abriendo Avenue would divide the wetlands near Santa Fe Drive east of I-25. Area of impact is 0.07 acres	Shifting I-25 to the east would result in the removal of almost 90 percent of the WL-2 near Santa Fe Avenue. Area of impact is 0.93 acres.
	Construction of new bridge piers over the Arkansas River would impact 0.02 acre of wetlands.
Total impact of 0.22 acre	Total impact of 1.10 acres

Source: New Pueblo Freeway Project Team, 2010.

Substantial efforts have been made to avoid and minimize impacts to the wetland. As noted earlier, there is a total of 13.85 acres of wetlands in the study area. Although complete avoidance of wetlands was not possible, an effort was made to avoid as many wetlands and other waters of the US as possible and to minimize impacts to others. As the project is located in a highly urbanized corridor, there is little room available to accommodate shifts in the alignment due to the proximity of residential and commercial structures. In some cases, avoiding wetlands and other waters of the US would cause considerable residential and commercial displacements and was not considered practicable. In other areas, wetlands exist along both sides of the roadway, so shifting one direction to avoid an individual wetland resulted in impacts to another wetland.

Project impacts have been minimized to the extent practicable, staying on the existing alignment where possible. New fill slopes have been steepened to 3:1 and the use of retaining walls will also be incorporated into the design in some locations to prevent new fill slopes from extending into wetland areas. This slope will allow vegetation to become established but will not pose a safety hazard to the motoring public. The alignment was shifted to the extent possible to reduce construction impacts into wetland areas sometimes at the cost of other resources. An example is an earlier alternative that was developed to avoid impacts to Mineral Palace Park, a Section 4(f) resource, included widening I-25 to east that would push the existing Union Pacific Railroad into the Fountain Creek. This alternative was dismissed because it would present unacceptable impacts to the floodplains, Fountain Creek and Wetland WL-5a and WL-5b.

Wetland impacts would be mitigated within the project area. The FACWet analysis performed in May 2010 by CDOT staff will be used to guide the types of functional values that the mitigation would seek to replace. While there are several potential mitigation locations within the study area, CDOT and FHWA intend to work with USACE staff to identify the best mitigation location and concept to replace the values of the impacted wetlands.

Section 4(f)

As with the wetland impacts, because of the similarity of the alternatives in the northern and southern areas of the project, the impacted 4(f) properties in those areas are the same. Because impacts to 4(f) properties are distinguishable only in the Central area, this discussion focuses on impacts in that area.

As detailed under the following discussion for each alternative, differences in impacts to historic resources occur at two residential properties, the Colorado and Wyoming (C&W) railroad line, and within the Steelworks Suburbs Historic District. The alternatives have common impacts to three residential structures, two commercial structures, and the Santa Fe Avenue Bridge. Both alternatives impact the C&W railroad line, but the Modified I-25 Alternative does not impact the unique High Rail segment of that line. Within the Steelworks Suburbs Historic District, the Modified I-25 Alternative impacts fewer structures and restores connectivity among the neighborhoods adjacent to the Santa Fe Avenue Extension.

Differences in impacts occur at two recreational properties in the Central project area. Benedict Park, located east of I-25 on Mesa Avenue, is a 1.9-acre park that contains informal athletic fields, a playground, basketball court, and picnic tables. The Runyon/ Fountain Lakes State Wildlife Area, located east of I-25 and just north of the Arkansas River, is a 400-acre undeveloped open space. With the exception of the Fountain Creek Trail, there are no other active recreational facilities within the parkland except picnic tables located along the trail.

Both alternatives would impact Mineral Palace Park, which is located on the west side of I-25, south of US 50B interchange in the northern area of the project. Fountain Creek parkland and its associated surface water and floodplain resources are located on the east side of I-25, along with a historic railroad line. The widening of I-25 would result in a loss of approximately 50 linear feet of the park along the eastern edge, approximately 1.4 acres of use. The avoidance and minimization efforts at Mineral Palace Park are notable and are indicative of the efforts made by the study team to balance impacts to resources. An alternative investigated to avoid impacts to Mineral Palace Park included widening I-25 to the east that would push the existing Union Pacific Railroad into the Fountain Creek. This alternative was dismissed because it would present unacceptable impacts to the floodplain, Fountain Creek, Wetland WL-5a and WL-5b.

Existing I-25 Alternative

Benedict Park

Under the Existing I-25 Alternative, I-25 would be widened to the east at this location, which would require that the Union Pacific Railroad rail line also move east into Benedict Park; 0.4 acre of the park's western edge would be used, leaving 1.5 acres of the park in place as a smaller park that could still function as a neighborhood "pocket" park. The informal athletic field would be reduced in size; however, the playgrounds and basketball court could continue to be used. As a result of the Existing I-25 Alternative improvements, 2.6 acres directly to the south of and across Mesa Avenue from Benedict Park would become an extension of the park, making the size of the revised Benedict Park a total of 4.1 acres. The new park plans proposed for the Existing I-25 Alternative address several issues at the existing Benedict Park, including parking, trees, and improved lighting. Improvements include a larger area, more amenities, and improved access.

Runyon/Fountain Lakes State Wildlife Area

No impacts will occur to the State Wildlife Area under the Existing I-25 Alternative.

Historic Properties

The remaining Section 4(f) properties impacted by the two Build Alternatives in the Central area are historic properties. The Existing I-25 Alternative would impact nine historic resources in the Central area. Three residential properties, two commercial properties, and the Santa Fe Avenue Bridge would be totally acquired and demolished. The historic segments of the Union Pacific Railroad and C&W railroad lines would be removed and relocated, including the C&W High Rail line, a unique feature. Additionally, a number of properties within the Steelworks Suburbs Historic District would be impacted, including the total or partial acquisition of 86 properties. The constrained right-of-way made avoiding individual resources difficult as the avoidance of one historic resource would ultimately result in impacts to one or more other resources.

Modified I-25 Alternative

Benedict Park

The Modified I-25 Alternative would realign the highway to avoid the Union Pacific Railroad freight rail line. This would require the use of the entire park (1.9 acres). The informal athletic fields, two playgrounds, picnic tables, picnic shelter, and a basketball court would all be eliminated.

Under this alternative, 4.3 acres of land south of Mesa Avenue would become a replacement park for the existing Benedict Park. The new park plans proposed address several issues at the existing Benedict Park, including parking, trees, and improved lighting. Improvements include a larger area, more amenities, and improved access. The benefit under the Modified I-25 Alternative is greater as a result of the ability to provide a larger, contiguous park when compared to the Existing I-25 Alternative.

Runyon/Fountain Lakes State Wildlife Area

Under the Modified I-25 Alternative, I-25 would leave the existing alignment at Ilex Street and follow a new alignment that would require four bridges to be constructed over the Arkansas River and within the Runyon/Fountain Lakes State Wildlife Area. Most of the I-25 mainline and adjacent ramps would fly over park property; however, bridge abutments on

the south side of the river would use some of the State Wildlife Area. For this alternative, Stanton Avenue (which currently ends at the State Wildlife Area) would be extended south on a bridge over the State Wildlife Area and the Arkansas River. Bridge piers would also be placed in the State Wildlife Area to support this bridge. The pedestrian bridge and trail would need to be removed and relocated.

Although there would be new bridge piers, the piers would be placed so they would not interfere with recreation. Measures to minimize harm to the Runyon State Wildlife Area were developed by the project team with input from Pueblo Conservancy District (the agency with jurisdiction over the property), City of Pueblo planning staff, and the public. As part of the Modified I-25 Alternative, 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 would span the river east of the current I-25 alignment. The trail that leads to the current pedestrian bridge would be relocated over the new pedestrian bridge to allow for crossing the Arkansas River and reconnecting to the Arkansas River trail. After construction, the trails would be fully usable by passing under the I-25 bridges and the Stanton Bridge. The bricks of greenway donors would stay in place, but the park benches and the memorial park bench will be moved to the east, closer to the lake and to a quieter location. After project completion and mitigation, there would be no permanent impacts to the primary recreational components of the State Wildlife Area, including fishing.

Historic Properties

The Modified I-25 Alternative would impact eleven historic properties in the Central area. Five residential properties, two commercial properties, and the Santa Fe Avenue Bridge would be totally acquired and demolished. All but two of the residential properties are the same as those impacted by the Existing I-25 Alternative. A portion of the C&W railroad line would be removed and relocated, but the High Rail line would not be impacted. The Colorado Smelting retaining walls would be directly impacted, and within the Steelworks Suburbs Historic District, 69 properties would be totally or partially acquired. The constrained right-of-way creates difficulty avoiding individual resources as the avoidance of one historic resource would ultimately result in impacts to one or more other resources.

Recommendation

Two build alternatives have been analyzed in detail for the I-25 New Pueblo Freeway project, the Existing I-25 Alternative and the Modified I-25 Alternative. Efforts have been made throughout the project study to avoid and minimize impacts to resources, including wetlands, waters of the US, parks and recreational facilities, and historic properties. For the Modified I-25 Alternative these efforts resulted in potential impacts to only 1.10 of 13.85 acres of wetlands in the study area. Of the 199 historic properties in the study area, only nine would potentially be impacted by the project.

The Modified I-25 Alternative should be identified as the preferred alternative in the DEIS. The Modified I-25 Alternative is recommended for the following reasons:

- Although both alternatives address the safety elements of the purpose and need, the Modified I-25 Alternative best meets the mobility elements because:
 - The Modified I-25 Alternative provides connectivity to the north and south with the extension of Stanton Avenue north and west to Santa Fe Avenue and south to Santa Fe Drive. Residents of the Bessemer Neighborhood east of I-25 would be more connected to the rest of the neighborhood, as well as the community resources in the Grove and Downtown Neighborhoods.
 - The Modified I-25 Alternative also improves north-south mobility by converting the existing I-25 south of the Arkansas River to be an extension of Santa-Fe Drive to facilitate local trips more efficiently and maintain regional trips on I-25 (see Exhibit 4 for more detail).
 - The Modified I-25 Alternative also improves east-west mobility over the Existing I-25 Alternative by providing a more direct connection to the interstate at Abriendo Avenue.
 - The extension of Santa Fe Avenue as a result of the Modified I-25 Alternative also provides a benefit to residences on the south end between Minnequa Avenue and Logan Avenue by returning the functionality of their properties. When I-25 was originally constructed homes that had access to Schley Avenue had their access removed and their front doors were adjacent to I-25. The access to these homes was only provided through the back alley. With the extension of Santa Fe Avenue these homes would have the access to the front of the house returned with access to Santa Fe Avenue.
- Both alternatives share the same impacts in the north and south sections of the project. The only difference in impacts occurs in the central section of the project between Ilex Street and the Evraz Rocky Mountain Steel Mills.
- Although the Modified Alternative impacts 2 additional historic properties compared to the Existing Alternative, the Modified Alternative has fewer impacts to properties within the Steelworks Suburbs Historic District, 69 would be fully or partially acquired, compared to 86 properties with the Existing Alternative.
- Wetland impacts differ by less than 1 acre, with the Modified I-25 Alternative impacting 0.88 acre more wetlands than the Existing I-25 Alternative.
- Impacts to Waters of the U.S. are nearly equal between the alternatives, with the Modified I-25 Alternative impacting just 0.02 acre of the Arkansas River. The impact would be greater due to the increased number of bridge piers required to span the Arkansas River.
- The estimated costs of each alternative were also considered; however, the costs between the two alternatives were too similar to be a differentiating factor.

- Both alternatives will impact Benedict Park, but while the initial impact is greater with the Modified I-25 Alternative, the Modified I-25 Alternative allows for the construction of a new 4.3 acre park to replace the existing Benedict Park. The Existing I-25 Alternative reduces the size of the existing park and creates a new 2.6 acre park across the roadway from the existing Benedict Park, which is less desirable.
- Although the Modified I-25 Alternative impacts more of the State Wildlife Area than the Existing I-25 alternative, the impacts are minor and do not affect the recreational use.
- There is very little difference between the Existing I-25 Alternative and Modified I-25 Alternative in terms of impacts to other resources. Both alternatives would impact minimal amounts of wildlife habitat, including Arkansas darter and plains leopard frog habitat. The Modified I-25 Alternative would impact one additional hazardous material site than the Existing I-25 Alternative, but it would also require less impervious surface area (4 acres less than the Existing I-25 Alternative), which would result in lower pollutant levels than the Existing I-25 Alternative.
- The City of Pueblo Parks and Recreation Department expressed its support for the Modified I-25 Alternative in a letter dated July 13, 2010. Their preference for the Modified I-25 Alternative is based on that alternative's ability to improve trail connections and facilitate north-south movement in the corridor.

The Colorado Department of Transportation (CDOT) and FHWA will work with USACE to identify suitable mitigation for impacts to wetlands and waters of the US. The study area includes several locations that may be suitable for replacing the functional values affected by impacts to wetlands, potentially including locations along the corridors of Fountain Creek and the Arkansas River, or within Lake Pueblo State Park. As discussed during a 2006 field visit with USACE, the mitigation measures may involve placing tree cuttings at the trailhead near the mouth of Fountain Creek and along Fountain Creek at State Highway 47 and planting trees near the Eagle Ridge interchange project.

The alternatives developed for the New Pueblo Freeway project have avoided the majority of wetland, waters of the US, and Section 4(f) resources present within the study area. The wetland resources impacted by both alternatives are unavoidable. The Modified I-25 Alternative represents the least environmentally damaging practicable alternative because, while it does have slightly greater impacts to wetlands, it better serves the purpose and need for the project by better restoring local access that was hindered by the original construction of I-25, allows for a replacement and expansion of Benedict Park, has fewer impacts to the Steelworks Suburbs Historic District, appears to be the Section 4(f) least harm alternative, and is supported by local officials. Further, the wetland impacts of the Modified I-25 Alternative may be mitigated within the study area, potentially providing equal or greater functional values than those impacted.

Exhibits

EXHIBIT 1
Project Study Area

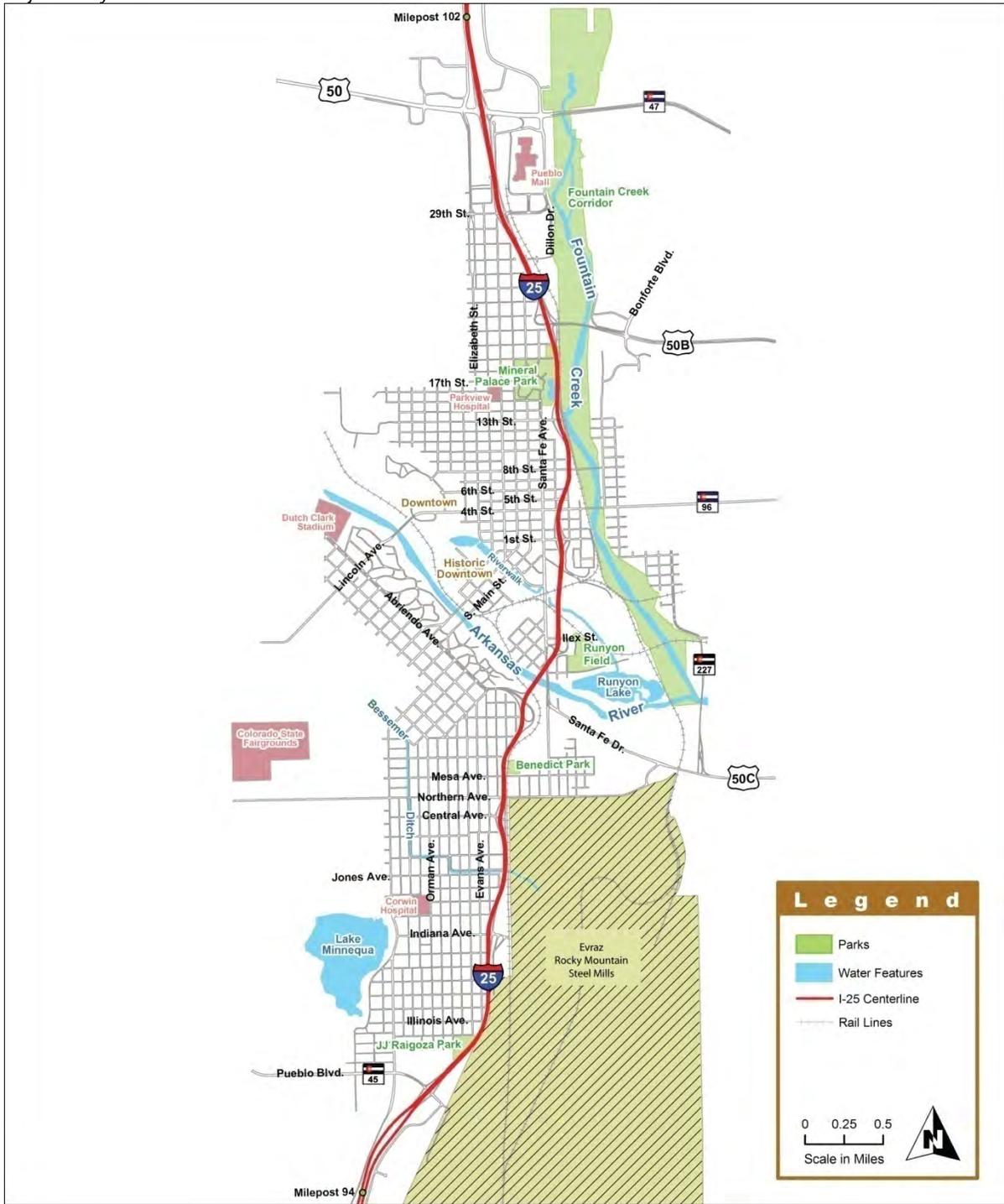


EXHIBIT 2
Existing I-25 Alternative

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 Hwy 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

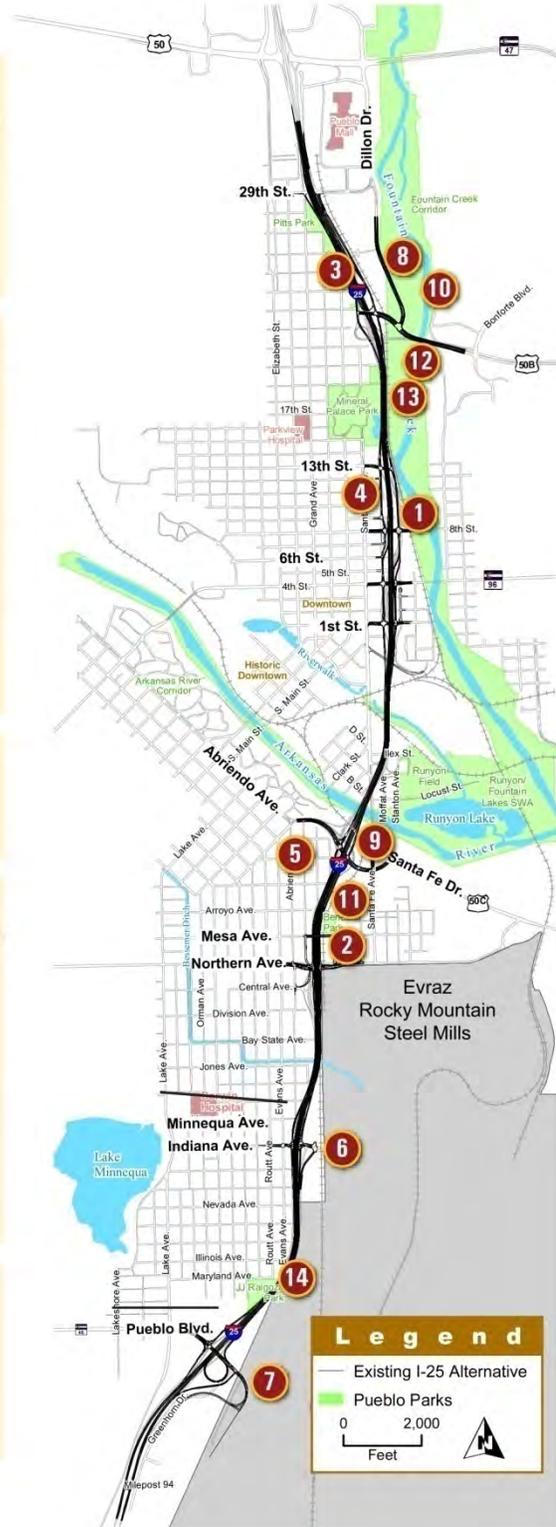
- 8 Extend Dillon Drive south from 26th Street to US Hwy 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US Hwy 50C)

Bicycle and Pedestrian Features

- 10 Build sidewalks along Dillon Drive extension and US HWY 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 Hwy 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

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



*A detailed map of the Existing I-25 Alternative is located in the CD accompanying the report.

EXHIBIT 3
Modified I-25 Alternative

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 from Abriendo Avenue to Indiana Avenue to eliminate relocation of the UPRR

Interchange Features

- 3 Diamond interchange at US Hwy 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 Hwy 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US Hwy 50C)
- 10 Extend Santa Fe Avenue from Iles 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 HWY 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 Hwy 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

- Circulator Bus System
- Transportation Systems Management (TSM)
- Travel Demand Management (TDM)
- Intelligent Transportation Systems (ITS)



*A detailed map of the Modified I-25 Alternative is located in the CD accompanying the report.

EXHIBIT 4
Modified I-25 Alternative with the New Stanton Avenue



EXHIBIT 5
Wetlands in the North Area



EXHIBIT 6
Wetlands in the South Area



EXHIBIT 7
Wetlands in the Central Area – Existing I-25 Alternative

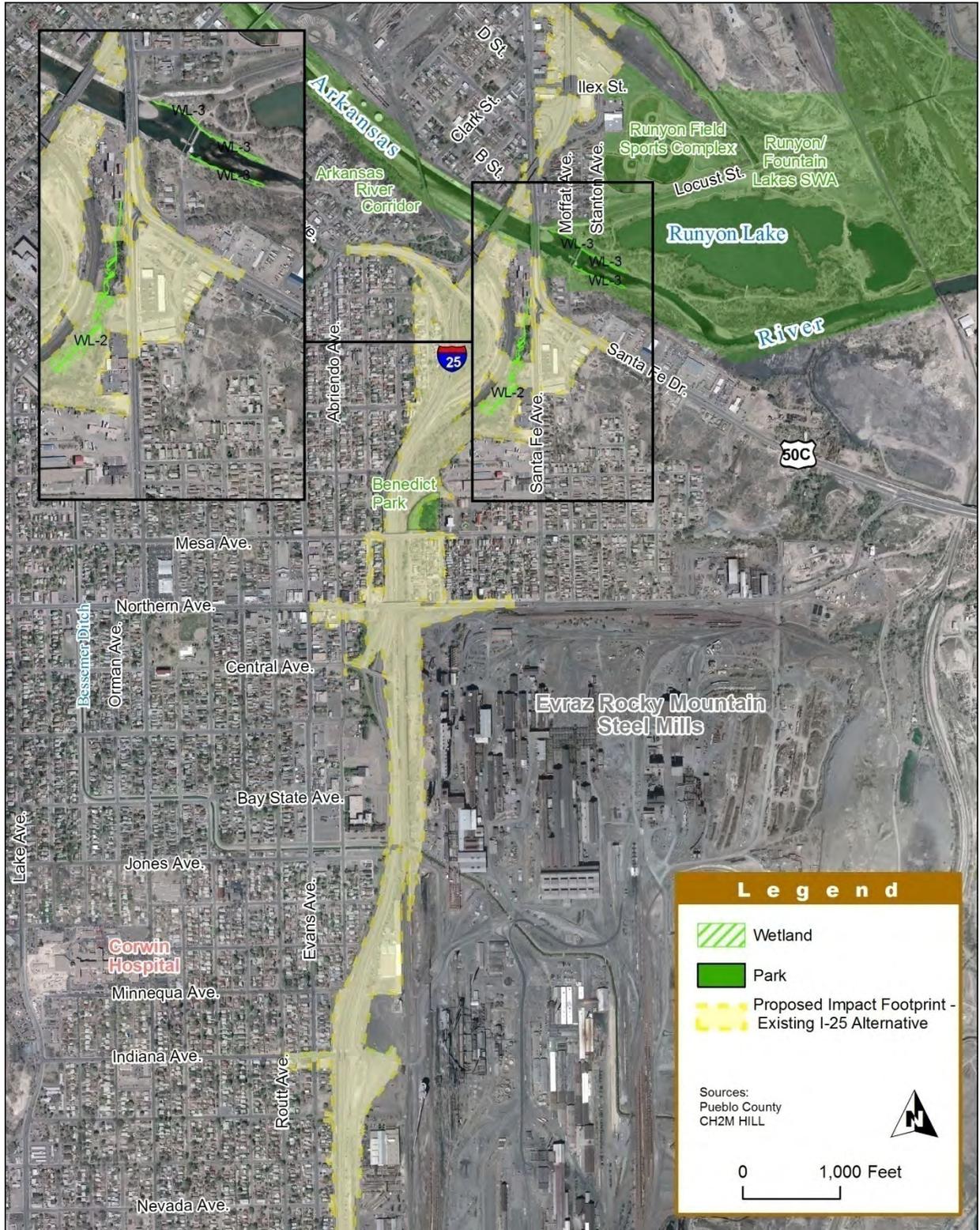
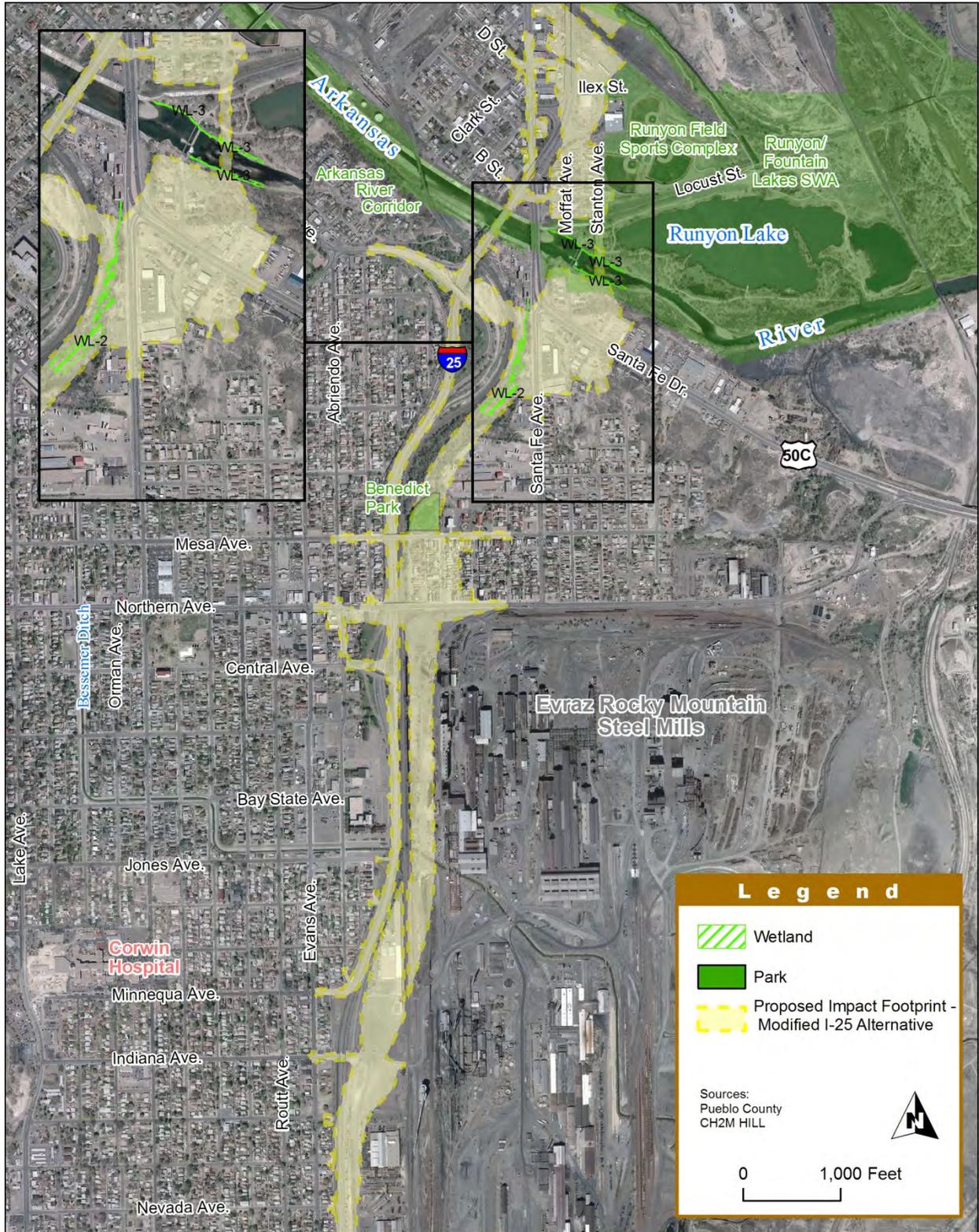


EXHIBIT 8
Wetlands in the Central Area – Modified I-25 Alternative





DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS
SOUTHERN COLORADO REGULATORY OFFICE
200 S. SANTA FE, SUITE 301
PUEBLO, COLORADO 81003

REPLY TO
ATTENTION OF:

December 6, 2010

Regulatory Division
Southern Colorado Branch

John Cater
Division Administrator
Federal Highway Administration
12300 W. Dakota Ave, Suite 180
Lakewood, CO 80228

Subject: Preferred Alternative Concurrence, for I-25 Pueblo

Dear Mr. Cater,

This letter responds to Summary of the I-25 Pueblo Freeway: Preferred Alternative, requesting concurrence with the draft alternatives.

Given our previous acceptance of the Purpose and Need statement and evaluation criteria, we concur with the selecting the proposed Modified Alternative as the Least Environmentally Damaging Practicable Alternative (LEDPA) for the detailed evaluation in the draft Environmental Impact Statement.

To be in compliance with 404(b)(1) Guidelines criteria, the selected route should be the LEDPA with regard to impacts to waters of the United States. If a route with greater impacts to waters of the U.S. is proposed, FHWA must demonstrate the alternative with less impacts is not practicable in terms of cost, logistics or technology to satisfy 404(b)(1) requirements. We also note the Guidelines require avoidance and minimization of impacts to waters of the U.S. to the extent practicable.

If you have any questions, I may be reached at (719) 543-6915 or van.a.truan@usace.army.mil if you have any questions.

Sincerely,

Van Truan
Chief, Southern Colorado
Regulatory Branch

Traffic Model Sensitivity Analysis Coordination

DEPARTMENT OF TRANSPORTATION

Region 2
Planning and Environmental Division
1480 Quail Lake Loop
Colorado Springs, CO 80906
(719) 227-3248 voice
(719) 227-3298 fax



December 21, 2010

Bill Moore, M.ITE
MPO Administrator
PACOG MPO/TPR
223 N Santa Fe Avenue
Pueblo, CO 81003

Dear Mr. Moore:

We have recently completed an update to the traffic analysis for the Interstate 25 (I-25) New Pueblo Freeway project. The traffic forecasts were updated to reflect 2035 conditions to re-confirm the conclusions in the original analysis.

The *2004 New Pueblo Freeway Traffic Report* (CH2M HILL, 2004) documented the traffic forecasting and analysis completed to support the evaluation of the design and operational alternatives for the New Pueblo Freeway project. The CH2M HILL team has worked closely with the City, PACOG, and CDOT staff in the development of these forecasts. The purpose of this letter is to document and request your concurrence on an update to the modeling process, assumptions, and results for compliance with the 2035 model.

Original Modeling Process

Travel demand forecasting for the year 2025 was performed using the Pueblo Area Council of Governments (PACOG) TransCAD travel demand model. The Highway Capacity Software (HCS) and the CORSIM simulation model were used to assess the operational measures of effectiveness (e.g., LOS and delay) for the freeway sections and intersections within the project limit. Throughout the modeling process, interim results were reviewed by a technical group comprised of City of Pueblo and CDOT staff.

Updated Assumptions for 2035 Analysis

Since completion of the 2004 traffic report, PACOG has updated their travel demand model to the year 2035. Since the project is on-going, the new horizon year necessitated a traffic sensitivity analysis to determine if the proposed build alternatives can accommodate the expected 2035 traffic volumes. Generally, changes in traffic mirror that of population, employment, and household growth. Therefore, the sensitivity analysis was completed using the updated 2035 socio-economic projections from the travel demand model.

Based on the 2035 socioeconomic data in the travel demand model, the growth in population from 2025 to 2035 was determined to be approximately 33,000 people, or a 15 percent increase, region wide. Employment growth is expected to be 20 percent (20,000 jobs) region wide from 2025 to 2035. Using the more conservative employment growth, the sensitivity analysis for 2035 was conducted assuming a 20 percent increase in traffic from the 2025 to the 2035 traffic forecast. The following presents the results of the 2035 traffic operations analysis.

Results

The results of the (original) 2025 traffic analysis, presented in Table 1, indicated that both the Existing Alignment and Modified Alignment alternatives adequately accommodate expected 2025 traffic, with all freeway segments predicted to operate at LOS C or better. Based on this analysis, both build alternatives are expected to provide improved operations compared to the No Action alternative. Between the two build alternatives, operations were expected to be very similar, both on the freeway and surface streets.

TABLE 1
System Data Summary for the Analysis Year 2025

System Data	No Action	Exist Align	Mod Align
Total Vehicle-Miles	65574	68814	70685
Vehicle Hours of Move Time	1403	1525	1599
Vehicle Hours of Delay Time	1352	1133	1253
% of Travel Time Delayed	49%	43%	44%
Vehicle Hours of Total Time	2755	2658	2852
Average Speed (mph)	24	26	25
Ratio of Move/Total Time	0.51	0.57	0.56
Minute/Mile of Delay Time	1.24	0.99	1.06
Number of Intersections w/ E (HCM/CORSIM)	2/2	0/1	1/3
Number of Intersections w/ F (HCM/CORSIM)	2/2	0/2	0/2
Percentage of Freeway Miles at LOS D	25%	0%	0%
Percentage of Freeway Miles at LOS E	7%	0%	0%
Percentage of Freeway Miles at LOS F	10%	0%	0%

Table 2 is a similar summary of the overall system performance projected for 2035. The build alternatives are projected to have speeds that are 40 percent higher and delays that are 50 percent lower, as compared to the No Action alternative. Comparing these results to the 2025 traffic analysis, the percentage of travel time delayed and the ratio of move time to total time in the network increase only slightly even though the volumes increase 20 percent and the vehicle-miles increase approximately 8 percent for the Existing Alignment and approximately 14 percent for the Modified Alignment.

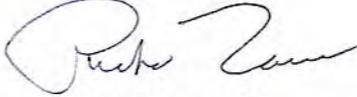
TABLE 2
System Data Summary for the Analysis Year 2035

System Data	No Action	Exist Align	Mod Align
Total Vehicle-Miles	68652	74633	80491
Vehicle Hours of Move Time	1470	1670	1819
Vehicle Hours of Delay Time	2625	1351	1476
% of Travel Time Delayed	64%	45%	45%
Vehicle Hours of Total Time	4095	3021	3296
Average Speed (mph)	17	25	24
Ratio of Move/Total Time	0.36	0.55	0.55
Minute/Mile of Delay Time	2.29	1.1	1.1
Number of Intersections w/ E (HCM/CORSIM)	2/2	0/2	1/2
Number of Intersections w/ F (HCM/CORSIM)	2/4	0/1	0/1
Percentage of Freeway Miles at LOS D	22%	2%	3%
Percentage of Freeway Miles at LOS E	6%	0%	0%
Percentage of Freeway Miles at LOS F	31%	0%	0%

In addition, we have attached the 2025 vs. 2035 Traffic Sensitivity Analysis Addendum for your review.

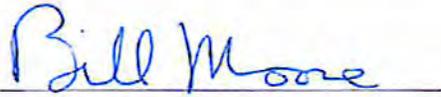
If you agree with the results provided and that, for purposes of evaluating expected 2035 future traffic conditions for the New Pueblo Freeway project, the consultant team has appropriately utilized the PACOG travel demand model please please indicate your concurrence by signing below.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Zamora".

Richard Zamora, PE
Resident Engineer
CDOT Region 2

PACOG has reviewed the information provided and concurs with the updated assumptions and the appropriate use of the travel demand model. The model results derived on that basis are in compliance with the PACOG 2035 Model..

A handwritten signature in blue ink, appearing to read "Bill Moore".

Bill Moore
Pueblo Area Council of Governments

Attachments