

3.2 HISTORIC PROPERTIES

Environmental laws and review processes at the federal, state, and local level require consideration be given to protecting significant historic, archaeological, and traditional cultural resources from damage or loss as a result of the project. CDOT and FHWA work with agencies, tribes, and other interested parties to identify significant properties and develop protection strategies. Federal laws such as the National Historic Preservation Act (NHPA) require that effects on significant cultural resources be considered during the public environmental review process. Section 106 of the NHPA, as amended, requires projects proposed or funded by federal agencies to identify cultural resources and assess effects to historic properties. This is generally accomplished through the Section 106 compliance process, which includes steps to: 1) identify consulting parties; 2) identify the Area of Potential Effect (APE); 3) identify and evaluate cultural resources; 4) assess effects to historic and archaeological resources eligible or listed on the National Register of Historic Places (NRHP); and 5) consult with the appropriate agencies to resolve and mitigate for adverse effects to historic properties.

Historic properties are resources that are listed, or considered eligible for listing, in the NRHP. Historic properties include districts, archaeological sites, buildings, structures, and objects that represent past human activities. The Section 106 process involves consultation with the State Historic Preservation Officer (SHPO) and other consulting parties. The following groups and organizations accepted invitations to be consulting parties in the Section 106 process for the New Pueblo Freeway Project:

- ❖ Bessemer Historical Society
- ❖ City of Pueblo Planning Department
- ❖ Colorado Preservation, Inc.
- ❖ National Trust for Historic Preservation
- ❖ Pueblo Historic Preservation Commission

The APE for historic and archaeological resources was developed through consultation with the SHPO and the consulting parties to encompass areas that could be directly or indirectly impacted by the project, including areas that may be susceptible to visual or noise impacts. In addition to contributing to the development of the APE, consulting parties were afforded the opportunity to review and

comment on the eligibility determinations, effects determinations, and potential mitigation measures. Consultation on the project APE with the SHPO and the consulting parties was accomplished through a series of meetings in September 2003 and December 2003. The SHPO provided comments on the APE in correspondence dated September 13, 2004 (see **Appendix B**). CDOT is continuing coordination with the consulting parties to discuss the potential mitigations and develop a Programmatic Agreement (PA) in 2011.

3.2.1 Native American Consultation

Section 106 of the NHPA and the Advisory Council on Historic Preservation regulations (36 Code of Federal Regulations [CFR] 800.2[c][2][iii]) mandate that federal agencies must involve interested Native American tribes in the planning process for federal undertakings. Consultation with federally recognized Native American tribes acknowledges the government-to-government relationship between the United States government and sovereign tribal groups. Federal agencies must be sensitive to the fact that historic properties of religious and cultural significance to one or more tribes may be located on ancestral, aboriginal, or ceded lands beyond modern reservation boundaries. Consulting tribes are offered the opportunity to identify concerns about cultural, traditional, and other resources and to comment on how the project might affect them. If it is found that the project would impact cultural resources that are eligible for listing in the NRHP or are of religious or cultural significance to one or more consulting tribes, their role in the consultation process may also include participation in resolving how best to avoid, minimize, or mitigate those impacts. By describing the proposed undertaking and the nature of known cultural sites (and consulting with the interested Native American community), CDOT and FHWA strive to effectively protect areas that are important to Native American people.

In August 2003, six federally recognized tribes with an established interest in Pueblo County were invited to participate as consulting parties:

- ❖ Apache Tribe of Oklahoma
- ❖ Cheyenne and Arapaho Tribes of Oklahoma
- ❖ Comanche Nation of Oklahoma

- ❖ Kiowa Tribe of Oklahoma
- ❖ Northern Arapaho Tribe
- ❖ Northern Cheyenne Tribe

One tribe (Kiowa Tribe of Oklahoma) responded to the invitation in writing, declining to participate as a consulting party (see **Appendix B**). No response was received from the remaining tribes.

3.2.2 Affected Environment

3.2.2.1 Historic Resources

A survey of all standing architectural features 45 years old and older within the APE was conducted between 2003 and 2005. The results of the survey and eligibility recommendations were submitted to the SHPO in 2007. At that time, the SHPO was unable to concur with 716 eligibility recommendations, or with the eligibility recommendations for potential historic districts, and the SHPO requested further information to complete the review. In response to this request for more information, the CDOT Project Team worked with the SHPO to develop a process to resurvey selected properties. As a result of this process, properties within the APE that would be directly impacted by only one of the two Build Alternatives were selected for resurvey. Properties outside of an NRHP-eligible historic district that would be impacted by both Build Alternatives or would not be impacted by the project were considered eligible for listing on the NRHP without resurvey. Properties within an NRHP-eligible historic district that would be impacted by both Build Alternatives or would not be impacted by the project were considered contributing elements to that historic district without resurvey. This process was devised in part because a full resurvey of all 716 properties for SHPO concurrence was not feasible within the schedule and financial constraints of the project.

Consultation with the SHPO and the consulting parties on NRHP eligibility determinations took place in July 2007, October 2008, March 2009, April 2009, August 2009, and May 2010. See **Appendix B** for the Section 106 correspondence associated with these efforts. A total of 886 historic resources were surveyed for the project. Of these, 200 are listed in the NRHP, or are officially NRHP-eligible.

These 200 properties are made up of 195 individual properties and 5 historic districts: North Side Historic District (6 contributing properties), Second Ward Historic District (33 contributing properties), Grove Historic District (76 contributing properties), Corona Park Historic District (6 contributing properties), and Steelworks Suburbs Historic District (465 contributing properties).

Each of these properties is detailed in the *Determination of Effects to Historic Properties: I-25 New Pueblo Freeway Improvement Project* (CH2M HILL, 2010a) and the *Addendum to the Determination of Effects to Historic Properties: I-25 New Pueblo Freeway Improvement Project, Pueblo, Colorado* (CH2M HILL, 2010b).

3.2.2.2 Archaeological Resources

A total of 127 historic archaeological sites were identified and documented within the APE. Of these, 5 sites were evaluated as eligible for listing in the NRHP and 109 sites were determined to need additional data prior to a final eligibility assessment. See *An Intensive Archaeological Resources Survey and Test Excavations for the I-25 New Pueblo Freeway Improvement Project, Pueblo County, Colorado* (CH2M HILL, 2008a) for more information about the archaeological investigations.

3.2.3 Environmental Consequences

Under Section 106 of the NHPA, effects to historic properties are defined in one of the following ways:

- ❖ **No Historic Properties Affected:** Historic properties are either not present or not affected by the action.
- ❖ **No Adverse Effect:** A historic property is affected but the characteristics that qualify the property for inclusion in the NRHP are not affected.
- ❖ **Adverse Effect:** An action directly or indirectly alters the characteristics of a historic property that qualify it for inclusion in the NRHP.

The environmental consequences described in the DEIS are based on the design of preliminary alternative alignments. Further Section 106 consultation will occur as the design is further refined.

3.2.3.1 No Action Alternative

The No Action Alternative consists of no capital improvements in the corridor study area but does include routine maintenance such as pavement overlays, restriping, etc. of the existing facility, as defined in the PACOG's financially constrained *Pueblo Area 2035 Long Range Transportation Plan* (PACOG, 2008). These activities would likely result in some effects to historic properties. For example, rail lines and ditches are likely to be affected as they are crossed, realigned, or repaired. Also, historic bridges may require maintenance and/or replacement. Because details about these activities are not yet known, it is difficult to evaluate the extent of the impacts.

3.2.3.2 Build Alternatives

Exhibit 3.2-1 details effects to historic properties for each of the Build Alternatives.

EXHIBIT 3.2-1

Summary of Effects to Historic Properties from the Build Alternatives

	Existing I-25 Alternative	Modified I-25 Alternative
No Historic Properties Affected	67	58
No Adverse Effect	104	107
Adverse Effect	33	40
Effect Determination Unknown ¹	1	0
Total	205²	205²

Sources: CH2M HILL, 2010a; CH2M HILL, 2010b.

I-25 = Interstate 25

¹ An effects determination has not been made for the Colorado Smelting Retaining Walls (5PE6937). Segment 5PE6937.1 of these walls will be incorporated into right-of-way (ROW), but at this level of design it is unknown how this ROW will be used and what the effects to the overall property will be.

² The 205 historic properties include 200 historic resources and 5 archaeological resources.

Determination of effects to historic properties was undertaken in consultation with the SHPO and other consulting parties. CDOT submitted effects determinations for SHPO and consulting party review in April 2010 and May 2010. The SHPO responded in correspondence dated

May 17, 2010 and June 14, 2010 (see **Appendix B**), and the consulting parties provided comments in correspondence dated August 3, 2010 (see **Appendix B**). Additional consultation with regard to the effects determinations for the North Side Historic District and Grove Historic District was conducted in October 2010 and December 2010 and is documented in letters dated October 21, 2010 and December 2, 2010 (see **Appendix B**). Detailed documentation supporting these determinations is presented in the *2010 Effects Report and Addendum* (CH2M HILL, 2010a; 2010b).

North Area

This section discusses impacts to historic properties in the north segment of the I-25 corridor, between 29th Street and Ilex Street. The Existing I-25 Alternative and Modified I-25 Alternative follow the same alignment in the North Area, so the impacts would be the same for both alternatives. Both Build Alternatives would result in adverse effects to the same 24 historic properties, including two historic districts. Historic properties with adverse effects in the North Area are shown by location in **Exhibit 3.2-2** and described in **Exhibit 3.2-3**. For additional information and graphics detailing these effects, refer to the *2010 Effects Report and Addendum* (CH2M HILL, 2010a; 2010b). Adverse effects result from direct impacts to 22 resources and indirect impacts to 2 resources.

Neither Build Alternative would result in impacts to archaeological sites in the North Area.

❖ **Impacts:** Direct impacts would result in adverse effects to 22 properties. Seven of the 22 properties are residential properties (5PE4536, 5PE4545, 5PE4547, 5PE4549, 5PE4557, 5PE4562, and 5PE5304). Of these, six are single-family dwellings and one is a multi-family building at 212 & 212 1/2 3rd Street (5PE4545). All seven properties would be totally acquired and demolished.

Twelve of the 22 properties are commercial properties (5PE5290, 5PE5291, 5PE5292, 5PE5293, 5PE5294, 5PE4484, 5PE5295, 5PE4498, 5PE4499, 5PE4504, 5PE4529, and 5PE4523). Two of these are hotels: one at 115 E. 8th Street (5PE4529) and another at 2424 N. Freeway (5PE5292). All 12 properties would be totally acquired and demolished. Three of the commercial properties (5PE4498, 5PE4499, and 5P4504) are directly impacted by measures proposed as mitigation

for project impacts to Mineral Palace Park. The proposed Mineral Palace Park Restoration Plan (discussed in greater detail in **Section 3.3 Parks and Recreation**), includes expanding the 50.07-acre park to 52.38 acres and realigning the park to the south. Properties 5PE4498, 5PE4499, and 5P4504 would be acquired and demolished to allow room for a community gathering area, relocation of the swimming pool, additional green space, and parking for the expanded park.

Both Build Alternatives would impact Mineral Palace Park (5PE586) through partial acquisition of the property. The widening of I-25 adjacent to the park would impact a 1,500-foot-long strip that is approximately 50 feet wide along the eastern edge of the park (approximately 1.69 acres or 3 percent of the 50.07-acre park), resulting in an adverse effect to the property.

Mineral Palace Park, shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-23**, is also located within the North Side Historic District (5PE5517), shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-31**. The adverse effects to the park would result in adverse effects to the historic district as a whole. There are no other direct impacts to the North Side Historic District. The 1.69-acre impact to the park represents less than 1 percent of the 219.88-acre total area of the historic district.

Both Build Alternatives would directly impact the Second Ward Historic District (5PE5518) due to widening of I-25 through the downtown area and construction of the entrance and exit ramps for the downtown exits. The limits of this district are shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-32**. Of the 33 contributing properties in the historic district, seven would be removed, which represents a 21-percent loss. The remaining contributing properties would be indirectly affected by the loss of these seven properties and by any noise and visual impacts within the overall historic district. These direct and indirect impacts would result in an adverse effect on the Second Ward Historic District.

Indirect impacts would result in adverse effects to two residential properties (5PE564 and 5PE4522).

Property 5PE564, shown in **Exhibit 3.2-2**, is a residential four-plex at 711 N. Albany Avenue. For both Build Alternatives, the structures on adjacent parcels to the east of the property would be removed and replaced with highway, frontage road, and a surface parking lot. The highway would be approximately 24 feet higher at this location than it is currently, as described in **Chapter 2 - Alternatives**. The noise level at this building would be close to 71 A-weighted decibels. A noise wall is not proposed for this area. The building currently faces a large surface parking area and a one-story structure, with no visual or noise intrusions from the existing I-25. The indirect visual and noise impacts would result in an adverse effect to this property.

Property 5PE4522, shown in **Exhibit 3.2-2**, includes two structures: a residence and a former commercial building that may be in use as a warehouse. Improvements between E. 9th Street and E. 4th Street, including a frontage road between E. 8th Street and E. 4th Street, an exit ramp from I-25 at 6th Street, and closure of N. Albany Avenue, would impact 5PE4522. The exit ramp would remove access to the residential building from N. Albany Avenue and would limit access to the commercial property. Access to both properties would be maintained from 5th Avenue. The property would also be impacted by increased noise levels and the visual intrusion of a 15-foot retaining wall across the street.

EXHIBIT 3.2-2
Adverse Effects to Individual Historic Properties and Historic Districts in the North Area

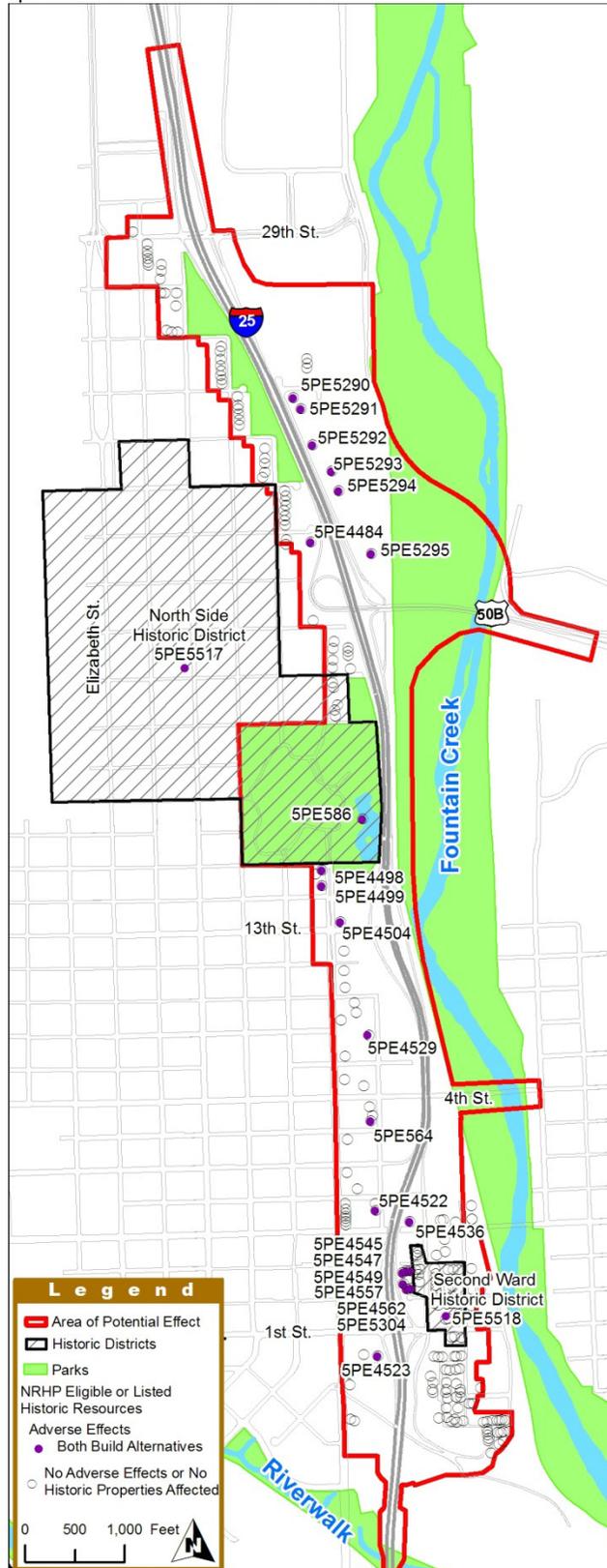


EXHIBIT 3.2-3

Historic Properties with Adverse Effects in the North Area

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE5290	A one-and-one-half-story commercial structure built circa 1940, located at 2520 N. Freeway in a primarily industrial and commercial area.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the ultimate location of the northbound US 50B ramp and frontage road to 29th Street.	
5PE5291	A one-story commercial building built circa 1950, located at 2516 N. Freeway in a primarily industrial and commercial area.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the ultimate location of the northbound US 50B ramp and frontage road to 29th Street.	
5PE5292	A one-story hotel built circa 1960, located at 2424 N. Freeway in a primarily commercial and industrial area.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the ultimate location of the northbound US 50B ramp and frontage road to 29th Street.	
5PE5293	A large, one-story commercial building built circa 1955, located at 107 E. 24th Street.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the ultimate location of the northbound US 50B ramp and frontage road to 29th Street.	
5PE5294	A one-story, vernacular commercial building built circa 1960, located at 106 E. 24th Street in a primarily commercial and industrial area.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the ultimate location of the northbound US 50B ramp and frontage road to 29th Street.	

EXHIBIT 3.2-3

Historic Properties with Adverse Effects in the North Area

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE5295	A one-story, vernacular commercial building built circa 1955, located at 2200 N. Freeway.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the realignment on US 50B at I-25.	
5PE4484	A one-story commercial establishment built in 1947, located at 100 W. 23rd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a post-war commercial building.	Adverse effect resulting from total acquisition and demolition of structure due to the southbound entrance ramp to US 50B.	
5PE586	Mineral Palace Park is an historic park located between the existing I-25 to the east and Court Street to the west. The southern boundary is E. 15th Street and the northern boundary is E. 19th Street.	This property is eligible for the NRHP under Criterion A and C for its associations with the development of public recreation in Pueblo, the growth of the City as an industrial center in the region, the Great Depression and the Work Projects Administration (WPA) period of local history, its landscape design values, and as a representative of park designs of the late 19th to early 20th century City Beautiful period.	Adverse effect resulting from partial acquisition of the property (approximately 1.4 acres, or 3 percent of the 50.07-acre park) due to the highway widening.	
5PE4498	A one-story commercial establishment built circa 1950, located at 1415 N. Santa Fe Avenue. It is currently identified as Mike Conley Auto Sales.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a postwar commercial building.	Adverse effect resulting from total acquisition and demolition of structure (required to implement the Mineral Palace Park Restoration Plan).	
5PE4499	A one-story, vernacular commercial building with a side gable roof built in 1956, located at 1405 N. Santa Fe Avenue. The original name of the business was Zim's Used Cars and it still functions as a used car dealership.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a postwar commercial building.	Adverse effect resulting from total acquisition and demolition of structure (required to implement the Mineral Palace Park Restoration Plan).	

EXHIBIT 3.2-3

Historic Properties with Adverse Effects in the North Area

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE4504	A set of associated commercial structures built in 1949 in the Novelty style common to the mid-20th century, located at 1300 N. Santa Fe Avenue.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a postwar commercial building.	Adverse effect resulting from total acquisition and demolition of structure (required to implement the Mineral Palace Park Restoration Plan).	
5PE4529	A two-story building built in 1953 and originally called the Downtown Hotel, now the Bramble Tree Inn, located at 115 E. 8th Street.	This property is eligible for the NRHP under Criteria A and C for its association with the theme of Urban Development, Architecture, and Neighborhood Evolution (1890-1940) and as representative of the changing commercial and transportation patterns during the mid-20th century.	Adverse effect resulting from total acquisition and demolition of structure due to widening and loss of access at 8th Street.	
5PE564	A two-story, masonry, foursquare residential building built circa 1900, located at 711 N. Albany Avenue. The east elevation contains the main entry, facing N. Albany Avenue.	This property is eligible for the NRHP under Criteria A and C for its association with the theme of Urban Development, Architecture, and Neighborhood Evolution (1890-1940) and as a good example of a foursquare building type.	Adverse effect resulting from indirect impacts (increase in noise levels and visual impacts of the elevated roadway).	
5PE4522	A one-story bungalow with a hipped roof and brick exterior walls built in 1907, located at 415 N. Albany Avenue. The main entry is offset and faces east to N. Albany Avenue.	This property is eligible for the NRHP under Criteria A and C for its association with the theme of Urban Development, Architecture, and Neighborhood Evolution (1890-1940) and as an example of the bungalow architectural form.	Adverse effect resulting from indirect impacts (access changes on Albany Avenue, increase in noise levels, and visual impacts).	
5PE4536	A two-story residential building built circa 1900, located at 221-23 E. 4th Street.	This property is eligible for the NRHP under Criteria A and C for its association with the theme of Urban Development, Architecture, and Neighborhood Evolution (1890-1940).	Adverse effect resulting from total acquisition and demolition of structure due to the northbound frontage road connection to 8th Street.	

EXHIBIT 3.2-3

Historic Properties with Adverse Effects in the North Area

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE4545	A one-story, multiple-family, residential bungalow built in 1903, located at 212 and 212½ E. 3rd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo as an example of a bungalow.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	
5PE4547	A one-story, L-shaped residential building from 1903, located at 216 E. 3rd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of an early 20th century residential structure.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	
5PE4549	A one-story residential building, constructed in 1906, located at 220 E. 3rd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a bungalow.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	
5PE4557	A two-story residential building built in 1903, located at 219 E. 2nd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of an early 20th century residential structure.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	
5PE4562	A one-story residential building built in 1909, located at 221 E. 2nd Street.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of an early 20th century residential structure.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	

EXHIBIT 3.2-3

Historic Properties with Adverse Effects in the North Area

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE5304	A one-story residential building built circa 1940, located at 217 E. 2nd Street.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to the realigned highway to the east.	
5PE4523	A two-story commercial building constructed circa 1930, located at 125 Hector Garcia Place.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure due to retaining walls required for the entrance and exit ramps at 1st Street.	
5PE5517 (North Side Historic District)	The North Side Historic District encompasses properties north and east of Mineral Palace Park on the east side of I-25.	This historic district is eligible for listing in the NRHP under Criterion A and C for association with patterns of early urban development in Pueblo and its diverse collection of architectural styles.	Adverse effect resulting from impacts to Mineral Palace Park (5EP586) due to the widening of the interstate and noise impacts.	
5PE5518 (Second Ward Historic District)	The Second Ward Historic District is located east of I-25 between 1st and 3rd streets.	This historic district is eligible for the NRHP under Criterion C for its collection of early examples of Pueblo's original architectural styles and housing types.	Adverse effect resulting from total acquisition and demolition of 7 of the 33 residential contributing properties (noise and visual impacts).	

Source: CH2M HILL, 2010a; 2010b.

I-25 = Interstate 25

NRHP = National Register of Historic Places

US 50B = United States Highway 50B

WPA = Work Projects Administration

South Area

No historic properties would be affected in the South Area.

Central Area

Both Build Alternatives would result in adverse effects to historic properties and districts in the Central Area. All of these resources are located between Ilex Street and Nevada Avenue (2 blocks south of Exit 96). Impacts differ between the alternatives because the Modified I-25 Alternative would be shifted to the east at approximately Ilex Street. Adverse effects are detailed for each alternative below. Historic properties with adverse effects in the Central Area are shown by location in **Exhibit 3.2-4** and described in **Exhibit 3.2-5**. For additional information and graphics detailing these effects, refer to the *2010 Effects Report and Addendum* (CH2M HILL, 2010a; 2010b).

Existing I-25 Alternative

The Existing I-25 Alternative would result in an adverse effect to nine historic properties, including one historic district. The Existing I-25 Alternative could also result in adverse effects to the Colorado Smelting Retaining Walls (5PE6937). Approximately 1,520 feet of segment 5PE6937.1 of the retaining walls would be incorporated into the ROW, but the property is not located within the toe of slope for the project. Because it is currently unknown how the ROW would be used or what the effect would be to the overall property, an effects determination has not yet been made. Effects to this property will be evaluated during final design.

- ❖ **Impacts:** Direct impacts would result in adverse effects to nine historic properties. Five of these would be totally acquired and demolished for the Existing I-25 Alternative, including three residential properties (5PE5090, 5PE5092, and 5PE5093), one commercial property (5PE4683), and the Santa Fe Avenue bridge (5PE3938). The Santa Fe Avenue bridge is functionally obsolete and structurally deficient. Under the Existing I-25 Alternative, traffic would be maintained on Santa Fe Avenue across the river, so a safe, sufficient, and functioning bridge would be required. A new bridge would be constructed at this location.

Impacts to the remaining four properties – the former Newton Lumber Company Complex (5PE5042), the Colorado & Wyoming (C&W) Railroad line (5PE5139), the Union Pacific Railroad (UPRR) rail line (5PE1776), and the Steelworks Suburbs Historic District (5PE5523) – are described in the following paragraphs.

Under the Existing I-25 Alternative, the highway would move approximately 200 feet closer to the former Newton Lumber Company Complex (5PE5042). This property is shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-41**. Approximately 0.06 acre of land would be acquired from the western portion of the parcel (2 percent of the property). None of the structures would be directly impacted, but the railroad spurs on the western edge of the property would become CDOT ROW, which would result in an adverse effect to the property.

The C&W Railroad operates a 4.5-mile switching line that connects the Evraz Rocky Mountain Steel Mill with the joint UPRR/BNSF rail line through Pueblo. The C&W rail line (5PE5139), shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-35**, carries coal, ore, and steel products and formerly ran the High Line Rail that remains on the site but is no longer in operation. The High Line Rail would be removed due to eastward movement and widening of I-25, and approximately 6,150 feet of the switching line would be relocated, causing an adverse effect.

Under the Existing I-25 Alternative, 1.41 miles (7,445 feet) of the southern segment of the UPRR line (5PE1776.15), shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-37**, would be realigned to the east starting from the Abriendo Avenue Extension on the north to just south of Logan Avenue on the south. The shift of I-25 to the east and the UPRR realignment would remove almost all of segment 5PE1776.16, shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-38**. The realignment of such a large segment of the track and the almost complete loss of the spur would result in an adverse effect to the UPRR line as a whole.

EXHIBIT 3.2-4
Adverse Effects to Historic Properties in the Central Area

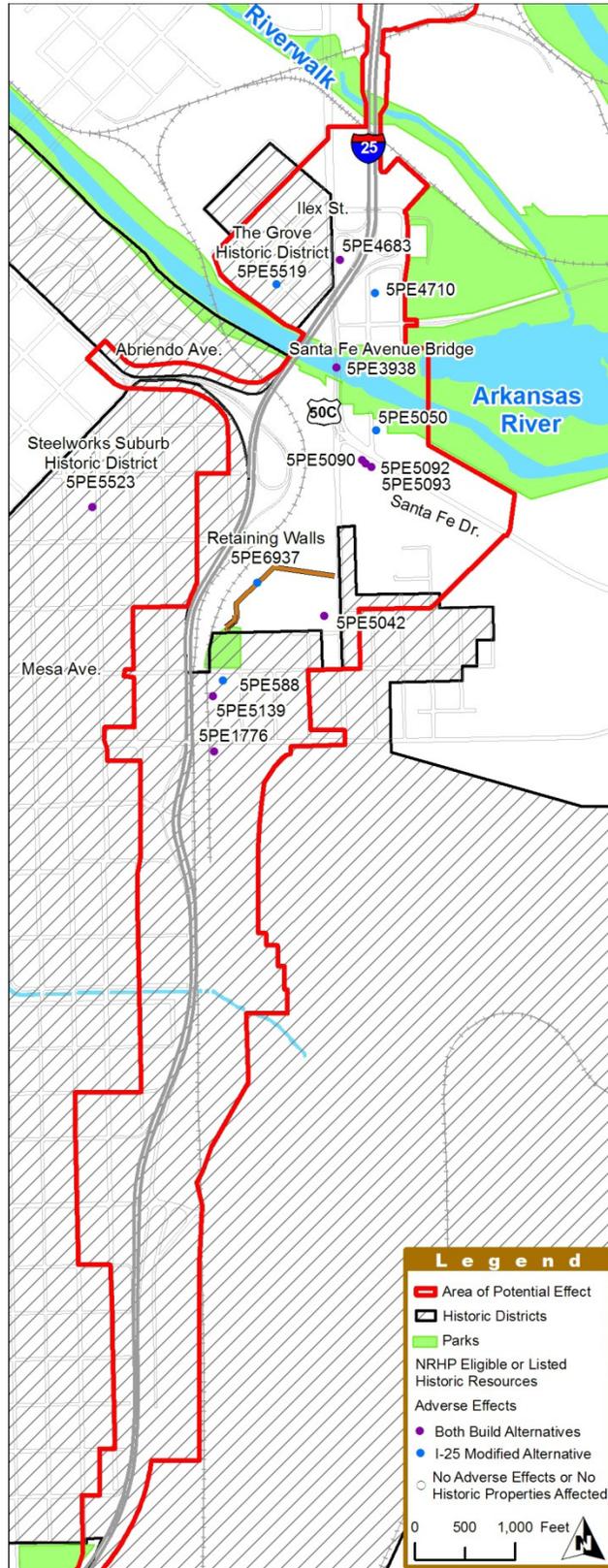


EXHIBIT 3.2-5

Historic Properties with Adverse Effects in the Central Area¹

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE4683	A two-story, vernacular commercial building located at 440 S. Santa Fe Avenue constructed circa 1900. The building is currently being used as a restaurant (Pixie Inn) and the original use is listed by the assessor as a tavern.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of a late 19th Century Commercial structure.	Adverse effect resulting from total acquisition and demolition of structure due to highway widening in the Existing I-25 Alternative or due to grade changes along Santa Fe Extension in the Modified I-25 Alternative. Adverse effect occurs under either Build Alternative.	
5PE4710	A one-story, shotgun form residential building constructed circa 1900, located at 516 Moffat Street.	The house is eligible for listing on the NRHP under Criterion C as a good example of the shotgun type of house.	Adverse effect resulting from total acquisition and demolition of structure due to the realignment of I-25 in the Modified I-25 Alternative. Adverse effect occurs under the Modified I-25 Alternative only.	
5PE3938	The Santa Fe Avenue bridge is a publicly owned bridge over the Arkansas River at milepost 1.33 of US 50. The bridge is approximately 286 feet long and 41 feet wide.	This property is listed in the NRHP under Criterion A and C for transportation and engineering and for its significance to the City as part of an enormous public works program to revitalize the City after the massive flood of 1921.	Adverse effect resulting from total acquisition and demolition of structure. The bridge is functionally obsolete and will need replacement for the Existing I-25 Alternative. For the Modified I-25 Alternative, the bridge is no longer needed for vehicular traffic. Adverse effect occurs under either Build Alternative.	
5PE5050	A one-story residential bungalow constructed circa 1930 is located at 736 Moffat Street. This structure is located in the Grove Neighborhood, which was traditionally an immigrant, working-class neighborhood in Pueblo.	This property is eligible for listing on the NRHP under Criterion C as an example of an early 20th century bungalow.	Adverse effect resulting from total acquisition and demolition of structure due to the realignment of I-25 in the Modified I-25 Alternative. Adverse effect occurs under the Modified I-25 Alternative only.	

EXHIBIT 3.2-5

Historic Properties with Adverse Effects in the Central Area¹

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE5090	A one-story residential building constructed in the early 1900s, located at 104 Santa Fe Drive. Part of a cluster of three residential buildings (5PE5090, 5PE5092, and 5PE5093) surrounded by commercial uses and large lots.	This property is eligible for the NRHP under Criterion A for its association with urban and neighborhood development in Pueblo.	Adverse effect resulting from total acquisition and demolition of structure. For the Existing I-25 Alternative, the property would be completely surrounded by roads. For the Modified I-25 Alternative, the property would be located within the highway alignment. Adverse effect occurs under either Build Alternative.	
5PE5092	A one-and-one-half-story residential bungalow built in 1918, located at 106 Santa Fe Drive.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of an early 20th century bungalow.	Adverse effect resulting from total acquisition and demolition of structure. For the Existing I-25 Alternative, the property would be completely surrounded by roads. For the Modified I-25 Alternative, the property would be located within the highway alignment. Adverse effect occurs under either Build Alternative.	
5PE5093	A one-story residential bungalow built in 1929, located at 108 Santa Fe Drive.	This property is eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of an early 20th century bungalow.	Adverse effect resulting from total acquisition and demolition of structure. For the Existing I-25 Alternative, the property would be completely surrounded by roads. For the Modified I-25 Alternative, the property would be located within the highway alignment. Adverse effect occurs under either Build Alternative.	

EXHIBIT 3.2-5

Historic Properties with Adverse Effects in the Central Area¹

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE6937 (Colorado Smelting Company Retaining Walls)	A network of roughly-squared stone retaining walls that range from 4 to more than 14 courses high and were constructed in the late 19th century as part of the Colorado Smelting Company. Segment 5PE6937.1 of the walls is located between the mainline of the UPRR line, St. Mary's School, and the former Newton Lumber Company properties.	The retaining walls are eligible for the NRHP under Criterion C for design, method of construction, and use of materials.	Adverse effect resulting from partial acquisition due to the alignment change of the highway under the Modified I-25 Alternative . An effects determination has not been made for the Existing I-25 Alternative.	
5PE5042 (Newton Lumber Company)	The former Newton Lumber Company, constructed in the late 19th century and located at 1103-07 S. Santa Fe Avenue. The area is now occupied by Northern Colorado Paper Company.	This property is eligible for the NRHP under Criterion C as a good example of manufacturing/industrial architecture associated with a lumber operation.	Adverse effect resulting from partial acquisition because of the shifted highway alignment for both Build Alternatives. Adverse effect occurs under either Build Alternative.	
5PE588 (St. Mary's Genealogy Center)	Constructed in 1924, St. Mary's Genealogy Center is a former elementary school located at 211 E. Mesa Street.	This property is officially eligible for the NRHP under Criterion A and C for its association with urban and neighborhood development in Pueblo and as an example of the Catholic Church architecture. It is also a contributing element to the Steelworks Suburbs Historic District (5EP5523).	Adverse effect resulting from indirect impacts by relocating the I-25 ramp and associated retaining wall near Mesa Avenue closer to this property under the Modified I-25 Alternative. Adverse effect occurs under the Modified I-25 Alternative only.	
5PE5139 (C&W Railroad)	The C&W Railroad operates a 4.5-mile switching line built circa 1900 that connects the steel mill with the UPRR/BNSF rail line through Pueblo. It carries coal, ore, and steel products and formerly ran the High Line Rail that remains on the site but is no longer in operation.	The C&W Railroad is considered eligible under Criteria A and C for its associations with the construction and evolution of the former CF&I plant in Pueblo. It represents the engineering, development, and evolution of an industrial railroad. It is also a contributing feature of the Steelworks Suburb Historic District (5PE5523).	Adverse effect resulting from realignment (under both Build Alternatives) and complete loss of the High Line Rail (under the Existing I-25 Alternative only).	

EXHIBIT 3.2-5

Historic Properties with Adverse Effects in the Central Area¹

Site Number	Description / Location	National Register of Historic Places Eligibility	Summary of Effects	
5PE1776 (UPRR)	Segment 5PE1776.15 of the UPRR is a 5.87-mile segment from Dillon Drive on the north to Illinois Avenue on the south. Segment 5PE1776.16 is a spur from the UPRR mainline south of Northern Avenue to north of Mesa Avenue. Both segments retain sufficient integrity to convey the significance of the line as a whole.	The UPRR is eligible for the NRHP under Criterion A for its contribution to the development of communities throughout Colorado and to the economic and industrial development of Pueblo.	Adverse effect resulting from realignment (under the Existing I-25 Alternative only) and complete loss of a spur (under both Build Alternatives).	
5PE5523 (Steelworks Suburbs Historic District)	Includes areas identified as the Bessemer, Minnequa Heights, and Lake Minnequa neighborhoods, as well as the Bessemer Works itself (now the Evraz Rocky Mountain Steel Mills), still in operation today (5PE5138, formerly the CF&I plant). The historic district is associated with the early development of the City of Bessemer in 1881.	The Steelworks Suburbs Historic District is eligible for listing on the NRHP under Criteria A and C for its significant role of the ethnically diverse workers of CF&I, the economic role the industry played in shaping the unique character of Pueblo, and as a cohesive group of similar building types, built for the purpose of housing workers at the neighboring steel plant.	Adverse effect resulting from total and partial acquisition of contributing properties, including some homes and the steel mill stacks (86 properties for Existing I-25 Alternative and 78 properties for Modified I-25 Alternative), as well as indirect effects. Adverse effect occurs under either Build Alternative.	
5PE5519 (Grove Historic District)	Encompasses properties west and northwest of the current I-25 alignment and north and northeast of the Arkansas River.	Th Grove Historic District is eligible for the NRHP under Criterion A and C for association with patterns of early urban development, the settlement patterns of various ethnic groups in Pueblo, and its collection of intact examples of residential and commercial buildings dating from the late 19th and early to mid-20th century.	Adverse effect resulting from total acquisition and demolition of one contributing property due to changes in the roadway elevation for the Santa Fe Extension. Adverse effect occurs under the Modified I-25 Alternative only.	

Source: CH2M HILL, 2010a; 2010b.

APE = area of potential effect
 BNSF = Burlington Northern Santa Fe
 CF&I = Colorado Fuel & Iron
 NRHP = National Register of Historic Places
 C&W = Colorado & Wyoming Railroad

National Register of Historic Places
 UPRR = Union Pacific Railroad
 US 50B = United States Highway 50B

¹ Exhibits 3.2-4 and 3.2-5 do not include the two NRHP-eligible archaeological sites (5PE5458 and 5PE5483) that would have adverse effects under the Modified I-25 Alternative.

A total of 86 properties within the Steelworks Suburbs Historic District (5PE5523) would be directly impacted by the Existing I-25 Alternative. The limits of the Steelworks Suburbs Historic District are shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-43 and Exhibit 4-44**. CDOT would acquire and demolish 78 properties within the historic district, 68 of which are contributing elements but are not individually eligible for listing on the NRHP. Eight properties would be partially acquired, including the steel mill, the Bessemer Ditch, the C&W rail line, and five residential properties. One full city square of properties would be demolished due to loss of access. The properties between Northern Avenue and Mesa Avenue on Taylor Avenue and Rio Grande Avenue would be removed, 33 of which are contributing elements to the historic district. There would be no adverse effects to St. Mary's Genealogy Center (5PE588), which is individually eligible for listing on the NRHP, or the Minnequa Steel Works Office Building & Dispensary (5PE4179), which was listed on the NRHP in 2002. Both are contributing properties to the historic district. Less than 1 percent (16.28 acres) of the Steelworks Suburbs Historic District (1,925.05 acres) would be impacted under the Existing I-25 Alternative.

The project would also result in visual impacts to the Steelworks Suburbs Historic District due to the demolition of some steel mill structures, noise walls, and street realignments. As a result of the direct and indirect impacts to the historic district, the integration between the steel mill and the residential neighborhoods it built would be lost, resulting in an adverse effect on the Steelworks Suburbs Historic District.

The Existing I-25 Alternative would not result in impacts to the NRHP-eligible archaeological sites; however, this alternative has the potential to impact 21 of the Need Data sites. These sites will be evaluated for eligibility and effects prior to publication of the FEIS.

Modified I-25 Alternative

The Modified I-25 Alternative would result in an adverse effect to 16 historic properties: 14 historic resources (including two historic districts) and two archaeological sites.

❖ **Impacts:** Direct impacts would result in adverse effects to 16 historic properties. Seven of these would be totally acquired and demolished for the Modified I-25 Alternative, including five residential properties (5PE4710, 5PE5050, 5PE5090, 5PE5092, and 5PE5093), one commercial property (5PE4683), and the Santa Fe Avenue bridge (5PE3938). All but two (5PE4710 and 5PE5050) of the residential properties are the same as those acquired under the Existing I-25 Alternative.

Impacts to the remaining nine properties – the Colorado Smelting retaining walls (5PE6937), the former Newton Lumber Company Complex (5PE5042), St. Mary's Genealogy Center (5PE588), the C&W rail line (5PE5139), the UPRR line (5PE1776), the Steelworks Suburbs Historic District (5PE5523), the Grove Historic District (5PE5519), and two archaeological sites (5PE5458 and 5PE5483) – are described in the following paragraphs.

Under the Modified I-25 Alternative, northbound and southbound lanes would be built over the Colorado Smelting retaining walls (5PE6937). Approximately 970 feet of segment 5PE6937.1 of the retaining walls would be incorporated into CDOT ROW, causing an adverse effect as shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-42**. Approximately 550 feet of segment 5PE6937.1 would remain intact.

Under the Modified I-25 Alternative, the highway would move approximately 600 feet closer to the former Newton Lumber Company Complex (5PE5042). This property is shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-42**. Approximately 0.19 acre of land would be acquired from the western portion of the parcel (8 percent of the property), and the railroad spurs on the western edge of the property would become CDOT ROW. Although none of the structures would be acquired, these impacts would result in an adverse effect to the property.

Under the Modified I-25 Alternative, approximately 6,885 feet of the C&W rail line, shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-36**, would be relocated (735 feet more than under the Existing I-25 Alternative), causing an adverse effect. However, the

High Line Rail would not be removed and would remain between the present I-25, which would become the Santa Fe Avenue Extension, and the proposed improvements, which would be elevated along about half of the length of the Evraz Rocky Mountain Steel Mills property (shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-48**).

Under the Modified I-25 Alternative, segment 5PE1776.15 of the UPRR would remain in place, as shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-39**. Approximately half of segment 5PE1776.16 north of Mesa Avenue would be removed, which would result in an adverse effect to the UPRR line as a whole. This is shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-40**.

A total of 70 properties within the Steelworks Suburbs Historic District would be directly impacted by the Modified I-25 Alternative. The limits of the Steelworks Suburbs Historic District are shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-45 and Exhibit 4-46**. Of those, 69 are contributing elements to the historic district and one is non-contributing. CDOT would acquire and demolish 56 contributing properties, and 13 contributing properties would be partially acquired. A total of 27.20 acres of the 1,926.05-acre historic district (1.41 percent) would be impacted as a result of moving highway lanes east of the current I-25 alignment and repurposing the existing I-25 as the Santa Fe Avenue Extension. The reconstructed highway would range from 5 feet to 30 feet higher than the existing highway through the Steelworks Historic District, with overpasses at Indiana Avenue and the railroad crossings. There would be no adverse effect to the Minnequa Steel Works Office Building & Dispensary (5PE4179), a contributing property to the historic district.

As with the Existing I-25 Alternative, the Modified I-25 Alternative would result in indirect visual impacts to the Steelworks Suburbs Historic District due to property demolitions, noise walls, and street realignments. There would be an adverse effect to St. Mary's Genealogy Center (5PE588), which is individually eligible for listing on the NRHP and a contributing property to the historic district, as a result of removing Benedict Park and moving I-25 closer to the property. These direct and indirect impacts would result in an adverse effect to the Steelworks Suburbs Historic District.

Two properties within the Grove Historic District would be directly impacted by the Modified I-25 Alternative. The limits of the Grove Historic District are shown in **Chapter 4 – Section 4(f) Evaluation, Exhibit 4-49**. One of the affected properties is a contributing element to the historic district (5PE4681), and one is non-contributing (5PE4680). Both properties would be adjacent to a 20-foot retaining wall and would lose their existing access from Santa Fe Avenue; therefore, both properties would be incorporated into CDOT ROW. As a contributing element to the historic district, removal of 5PE4681 would result in an adverse effect to the historic district as a whole. These properties represent a 0.04-acre impact to the 35.74-acre total historic district, or 0.11 percent.

The Modified I-25 Alternative would result in an adverse effect to two of the NRHP-eligible archaeological sites: 5PE5458 and 5PE5483. Cut-and-fill activities during construction would likely destroy site 5PE5458. Mitigation proposed for impacts to Benedict Park as currently planned (relocating the park) would destroy site 5PE5483. Both of these sites are significant because of what can be learned by data recovery, and both have minimal value for preservation in place.

The Modified I-25 Alternative has the potential to impact 22 of the Need Data sites, 11 of which are the same sites that would be impacted by the Existing I-25 Alternative. These sites will be evaluated for eligibility and effects prior to publication of the FEIS.

3.2.3.3 Indirect Effects

Indirect effects to historical properties would occur under either Build Alternative. The proposed infrastructure, bridges, and traffic patterns have the potential to introduce or add to visual, vibration, and audible elements that could diminish the integrity of feeling and association related to a historic property's significant features and setting. Indirect effects from roadway noise, vibration, or visual intrusion would be minor for most properties as I-25 is an established feature of the setting through Pueblo. As detailed in Section 3.2.3.2, indirect effects result in adverse effects to three historic properties (5PE564, 5PE4522, and 5PE588).

Both Build Alternatives improve access between local roadways and I-25, which could attract new developments and/or redevelopment in the City. Therefore, potentially adverse indirect effects to historic sites may occur if the project area redevelops. The majority of identified historical

sites in the study area continue to be actively used and operated, and there is low potential for indirect effects on historical resources beyond the potential impacts cited above.

3.2.4 Avoidance and Minimization

A concerted effort was made to minimize effects to historic properties throughout the development of the project. The CDOT Project Team evaluated alternative strategies that bypassed the downtown area. While these strategies would have avoided many of the historic properties in the downtown area, they were eliminated from further consideration because they were costly, had other significant environmental effects, and did not meet the project Purpose and Need.

Once the Build Alternatives were identified, the CDOT Project Team evaluated design options that would minimize effects to historic properties. For example, four interchange configurations were considered near Mineral Palace Park. The CDOT Project Team considered moving the north terminus south from 13th Street to protect Mineral Palace Park; however, it was determined through public meetings with affected neighbors and merchants and through technical analysis that a 13th Street connection is critical to the operation of this interchange.

In the North Area and South Area, impacts to historic properties were minimized by staying as close to the existing alignment as possible. Options for adjusting the alignment in other locations were also considered. While some of these options minimized effects to properties in one location, each resulted in effects to historic properties in other locations. For example, avoiding a property on the west side of the highway would require widening to the east, which could result in effects to another historic property. Ultimately, the project is constrained by existing development, historic properties, Fountain Creek, and historic railroads; therefore, any options considered require a trade-off between historic properties.

CDOT will undergo further efforts to minimize impacts to historic properties during final design of the project.

3.2.5 Mitigation Measures

In consultation with the SHPO and the consulting parties, FHWA and CDOT have determined that the project results in adverse effects to historic properties. Under the Section 106 process, adverse effects to historic properties must be resolved and mitigated through consultation.

A PA will be developed to outline mitigation and the Section 106 procedures for future consultation efforts. The signatories to the PA include the FHWA, the Advisory Council for Historic Preservation, and the Colorado SHPO. CDOT is an invited signatory. Consulting parties are invited to sign the agreement as concurring parties. If consulting parties are financially or otherwise responsible for the completion of any mitigation measures stipulated in the PA, they may be asked to participate as invited signatories to the agreement.

The potential mitigation measures identified in this section represent the effort by FHWA and CDOT to consult with the SHPO and the consulting parties to resolve adverse effects pursuant to 36 CFR 800.6 (b)(1)(i). Not all of these possible mitigation measures will be implemented as part of this project. Additional consultation between the FHWA, CDOT, SHPO, and consulting parties will be necessary to identify the final mitigation for historic properties. Final mitigation measures will be formalized in the PA.

The following list includes potential mitigation measures identified in the March 2010 Section 106 Determination of Effects report (CH2M HILL, 2010a; 2010b):

- ❖ Evaluate opportunities to relocate selected residential structures with good historic integrity to a location where they can be restored and maintained for interpretive use. This assumes that a party other than CDOT would be responsible for ownership and future maintenance of the structure.
- ❖ In consultation with the SHPO and the consulting parties, select a sample of properties for Office of Archaeology and Historic Preservation (OAHP) Level II documentation prior to demolition, in accordance with the guidance found in OAHP Form #1595, Historical Resource Documentation: Standards for Level I, II, III Documentation.

- ❖ For archaeological sites, conduct controlled excavation to recover significant information from subsurface contexts will be performed prior to final design and construction. Such research would add to the archaeological database for urban residential and/or commercial sites and serve to complement and enhance existing historical records.
- ❖ For historic districts, develop and distribute a book, article, pamphlet, or brochure that traces the history of the neighborhood and its development. Create a poster or interpretive materials for use at the CF&I Archive and Steelworks Museum of Industry and Culture and in schools.
- ❖ Digitize *The Bessemer Indicator* newspaper, a resource recently donated to the Bessemer Historical Society. These digitized and searchable papers could be useful to people doing genealogical, historic, and architectural research.
- ❖ Extract pertinent data regarding residences, architecture, and Bessemer neighborhood development from the *Camp and Plant* publications and create a database for public use.
- ❖ Relocate the neon sign associated with the Moreschini car lot at the corner of N. Santa Fe Avenue and East 13th Street (5PE4504).
- ❖ Develop an interpretive plan for Mineral Palace Park using historic period resources (e.g., hand-colored postcards, historic maps and planting plans, and historic photographs).
- ❖ Complete an intensive-level survey of Mineral Palace Park that documents the park and its features on OAHP site forms.

The additional potential mitigation measures listed below were identified in a meeting between CDOT, the SHPO and the Section 106 consulting parties on January 5, 2011:

- ❖ Extend the existing worker tunnel under I-25 between the former Minnequa Steel Works Office Complex and the Steel Mill complex for interpretive use by the Bessemer Historical Society. This assumes that a party other than CDOT would be responsible for ownership and future maintenance of the tunnel.
- ❖ Complete a historic structure assessment to determine the physical condition and relocation potential of the Steel Mill blast furnace.
- ❖ Develop and install interpretive materials in Mineral Palace Park. Materials may include signage or a ghost structure on or near the site of the original Mineral Palace.
- ❖ Stabilize WPA-era walls in Mineral Palace Park.
- ❖ Prepare NRHP nominations for select properties identified in consultation with the SHPO and the consulting parties.
- ❖ Design and install a mural that depicts highlights of Pueblo history. The location of the mural will be identified in consultation with SHPO and the consulting parties.
- ❖ Provide a financial donation to support the CF&I Archives and Steelworks Museum of Industry and Culture School Bus Field Trip scholarship program.
- ❖ Develop historic context studies for neighborhood historic districts.