

## 3.6 SOCIAL RESOURCES, ECONOMIC CONDITIONS, AND ENVIRONMENTAL JUSTICE

This section describes the social resources, economic conditions, and environmental justice issues for the Pueblo area along the I-25 corridor, the potential impacts of the Build Alternatives on these conditions, and potential mitigation measures. Additional information may be found in the *Socioeconomics Technical Memorandum, New Pueblo Freeway* (CH2M HILL, 2003), the *Environmental Justice Analysis Technical Memorandum, New Pueblo Freeway* (CH2M HILL, 2005b), and the *Social Resources Technical Memorandum, New Pueblo Freeway* (CH2M HILL, 2005c). Specific right-of-way (ROW) impacts to public and private properties are discussed in **Section 3.4 Right-of-Way and Relocations**, and impacts to parks are discussed in **Section 3.3 Parks and Recreation**.

### 3.6.1 Affected Environment

#### 3.6.1.1 Population and Employment Characteristics

According to population estimates from the Colorado Department of Local Affairs (DOLA) (DOLA, 2009), Pueblo County had a population of 158,362 in 2009. The City of Pueblo is the largest municipality in Pueblo County, and at 106,895 residents in 2009, the City accounted for 68 percent of the County's population (DOLA, 2009). DOLA forecasts that the Pueblo County population will increase by nearly 85,000 residents, or 60 percent, between 2000 and 2030. This growth would be markedly higher than historic rates as the county grew by a total of only 25 percent between 1970 and 2009.

The U.S. Census Bureau collects American Community Survey (ACS) data in 1-, 3-, and 5-year forecast estimates, which means that they represent the characteristics of the population over a specific data collection period. Data are combined to produce 12 months, 36 months, or 60 months of data (U.S. Census Bureau, 2003). Five-year employment estimates from the ACS are the most recent available for Pueblo County. Data from the 2005-2009 ACS estimates a labor force of approximately 71,793 in Pueblo County (U.S. Census Bureau, 2009). The economic sectors that provided the most employment in Pueblo County for this period were educational services, health care, and social assistance (23.0 percent); wholesale and retail trade (15.3 percent); arts, entertainment, recreation, and other

services (12.6 percent); and construction (8.4 percent). Approximately 59 percent of employment in Pueblo County is in these sectors.

In 2009, unemployment in Pueblo County was 8.7 percent, 1 percent higher than for the State of Colorado (7.7 percent). Pueblo County's historical unemployment rate has fluctuated from 3.9 percent to 9.3 percent. The highest unemployment was in the early 1900s when the Colorado Fuel & Iron (CF&I) Steel Mill (now known as the Evraz Rocky Mountain Steel Mills) closed (Southern Colorado Economic Development District, 2011).

#### 3.6.1.2 Neighborhoods and Community Resources

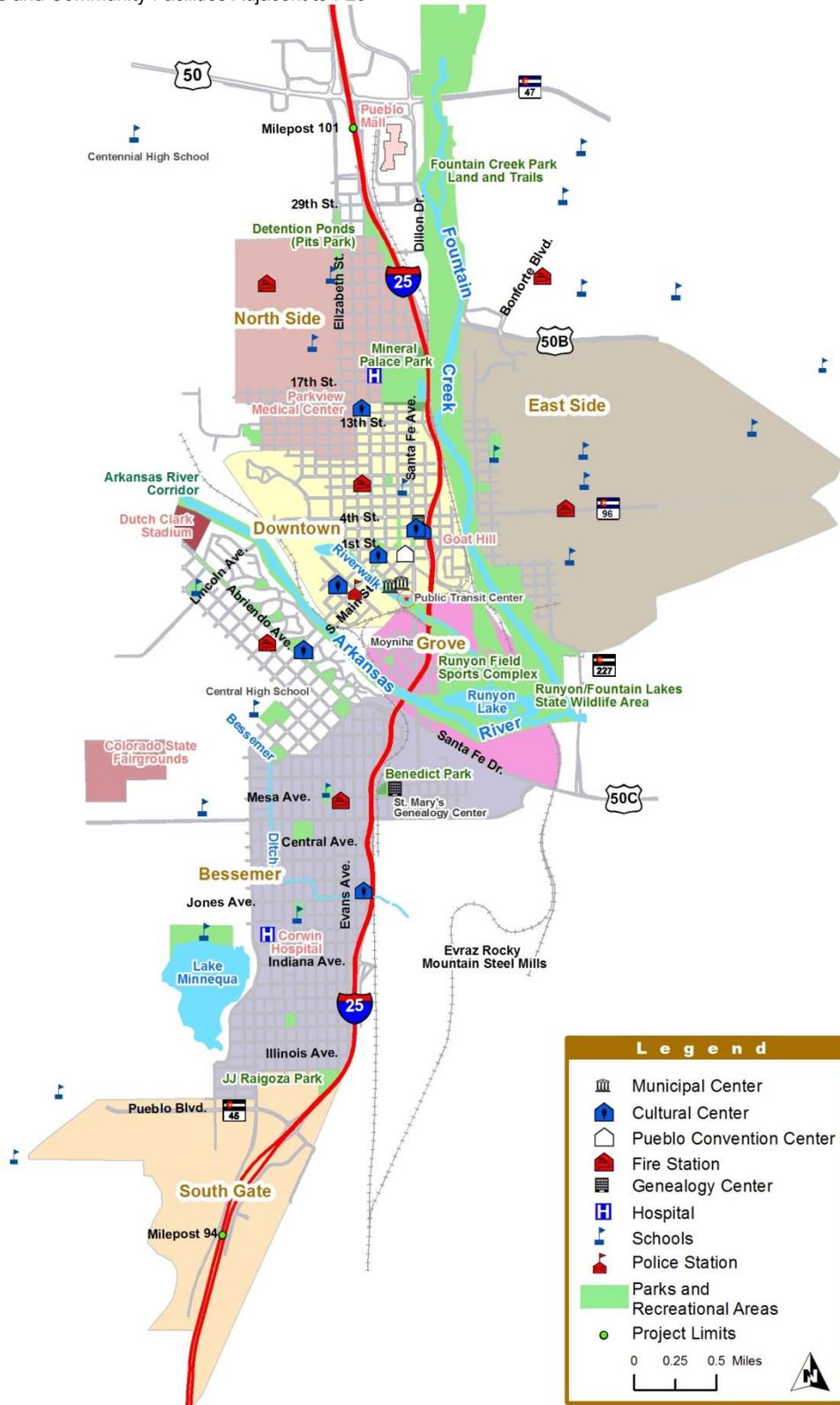
An initial delineation of neighborhood boundaries in Pueblo was developed as part of the 1980 U.S. Census Bureau Neighborhood Statistics Program. That delineation has evolved with the current activities of the City neighborhood planning program, which has revisited those boundaries. As shown in **Exhibit 3.6-1**, there are six neighborhoods (as defined by the City) adjacent to the I-25 corridor: North Side, East Side, Downtown, Grove, Bessemer, and South Gate.

Pueblo has numerous parks and recreation resources, government services, and community facilities. Community facilities typically include schools, hospitals, cultural facilities, and emergency services. The defining community resources and facilities are shown in **Exhibit 3.6-1** and described by neighborhood below.

##### **North Side Neighborhood**

The North Side Neighborhood skirts the northwest corner of the study area and extends from 27th Street to 11th Street to the south and I-25 to High Street to the west. This neighborhood is unique in location because it is situated close to the downtown amenities and in proximity to the Pueblo Mall, a popular shopping area. The neighborhood grew up around Mineral Palace Park, which is what remains of the Colorado Mineral Palace exhibit hall and grounds that were built in the 1890s to advertise Colorado's mineral resources to the world. The park is a defining factor in the history and promotion of real estate in this area. The citizens of Pueblo take pride in the beauty of Mineral Palace Park and cherish the role it has played in Pueblo's history.

**EXHIBIT 3.6-1**  
**Pueblo Neighborhoods and Community Facilities Adjacent to I-25**



Residential subdivisions were developed by 1890, in addition to the original homes of the neighborhood. Lots tend to be larger in this area, resulting in lower housing density compared to other neighborhoods within Pueblo. After World War II, the character of the North Side Neighborhood began to change due to the increase in automobile use and relocation of middle class families toward the edges of the city. With the construction of I-25, the original eastern edge of the neighborhood was lost.



**Homes in the North Side Neighborhood**

The North Side Neighborhood contains commercial uses along 29th Street and Elizabeth Street. Community resources in and adjacent to the North Side Neighborhood include Mineral Palace Park (described further in **Section 3.3 Parks and Recreation**); Parkview Medical Center, the largest private sector employer in Pueblo (17th Street and Court Avenue); Fire Station #5 (2401 6th Avenue); and three schools (Somelid Elementary, Freed Middle, and Centennial High).

#### ***East Side Neighborhood***

The East Side Neighborhood is situated east of I-25 and its boundaries are shaped by Fountain Creek on the west, the Pueblo municipal boundary on the south and east, and US 50B to the north. The East Side Neighborhood has a mixture of older homes and recently constructed homes. The overall housing stock is predominately small single-story structures with a few architecturally unique “craftsman style” homes located throughout. There is a concentration of multi-family housing and mobile homes located in the eastern and northern parts of the neighborhood, and several active business districts are located along the major thoroughfares.

Community resources in and adjacent to the East Side Neighborhood include Fire Station #6 (1325 E. 4th Street), Fire Station #8 (1551 Bonforte Boulevard), multiple pocket and neighborhood parks, and ten schools. Of the schools, only Risley Middle School, located east of I-25 on Monument Avenue, has attendance boundaries that cross I-25.

#### ***Downtown Neighborhood***

The Downtown Neighborhood consists of areas west of I-25, extending from Parkview Medical Center and Mineral Palace Park on the north to the Arkansas River on the south. This neighborhood is the historic commercial center of Pueblo, and many regional community, financial, and governmental resources are located in this area. I-25 divides the neighborhood, segregating an area known as Goat Hill between the highway and Fountain Creek. Goat Hill contains a mixture of residential, commercial, and industrial activities. I-25 is the western boundary for Goat Hill; however, prior to the construction of I-25, Goat Hill was an extension of the central business district. The majority of residences in this area are single-family homes, of which less than half are owner-occupied.



**Homes in the Downtown Neighborhood  
East of I-25 (Goat Hill)**

Community resources in the Downtown Neighborhood include Pueblo City Hall (200 South Main Street), Pueblo County Complex (215 West 10th Street), Pueblo Police Department (130 Central Main Street), Fire Station #1 (425 West 7th Street), the Rosemont Museum (14th Street and Grand Avenue), the Historic Arkansas Riverwalk of Pueblo (HARP), the Sangre de Cristo Arts and Conference Center (adjacent to I-25 at 2nd Street and Santa Fe Avenue), the Buell Children’s Museum (located within the

Sangre de Cristo Arts and Conference Center), the El Pueblo History Museum (1st Street and Union Avenue), the Latino Chamber (215 South Victoria Avenue), and the Pueblo Convention Center. No schools are located within this neighborhood.

A cluster of government offices and services, including Pueblo City Hall, are located near the intersection of South Main Street and Grand Avenue. The area attracts those doing business with the City and seeking health care or law enforcement services. The Pueblo County Administrative Complex is located at 10th Street and Main Street. The complex consists of the courthouse and ancillary office buildings that house motor vehicle registration, the assessor and clerk's office, the Department of Emergency Management, and other administrative functions. The Pueblo County Health Department is nearby at 9th Street and Santa Fe Avenue.



**Downtown Neighborhood Streetscape**

### ***Grove Neighborhood***

The Grove Neighborhood, whose boundaries differ from the Grove Historic District, is bounded by Santa Fe Drive and the Arkansas River to the south, the Downtown Neighborhood to the north, and rail yards and rail lines to the west and east.

The Grove Neighborhood was established in 1891 by immigrants from the Austro-Hungarian Empire. Employed in the CF&I Steel Mill (now known as the Evraz Rocky Mountain Steel Mills), these Germans, Slovenians, and Slovaks represented just a part of the wave of immigrants from central Europe that settled in Pueblo during the late 19th and early 20th centuries.

The Grove Neighborhood is primarily residential, with an estimated 110 homes located to the west of I-25 and 34 homes to the east. There is also a mixture of land uses sprinkled throughout the neighborhood, including the Clark Spring Water Company, the Monastery of Our Heavenly Father, Mount Carmel Catholic Church, and the Grove tavern. The perimeter of the neighborhood is primarily industrial along D Street and commercial along Santa Fe Avenue.

Churches in the Grove Neighborhood reflect the diverse ethnic groups in the area, catering to Italians, Greeks, and other ethnic religious groups. Historically family-owned markets serviced this working-class neighborhood and also sold products on credit, a significant benefit to local residents. Many of the local grocery stores closed when competitor stores such as Safeway were built.

The Arkansas River flood of 1921 washed away much of the neighborhood, but most of the residents decided to rebuild rather than relocate, most likely because they depended on the nearby steel mill for employment. The eastern portion of the Grove Neighborhood was originally isolated by this flood. The construction of I-25 in the 1950s further divided the neighborhood, isolating homes from other residential and commercial areas within the neighborhood.

Community facilities in the Grove Neighborhood include the Runyon/ Fountain Lakes State Wildlife Area, the Runyon Field Sports Complex (both facilities are discussed further in **Section 3.3 Parks and Recreation**), and Moynihan Park. No schools are located within this neighborhood.

### ***Bessemer Neighborhood***

The Bessemer Neighborhood is located south of the Arkansas River a few miles south of Downtown Pueblo and straddles I-25. The Evraz Rocky Mountain Steel Mills forms the eastern and a portion of the southern border of the neighborhood. The remainder of the boundary is formed by a number of roads that surround the neighborhood.

The Bessemer Neighborhood is one of the oldest communities in both Pueblo and the state, corresponding to the opening of the CF&I Steel Mill in the late 1800s. The neighborhood was developed by generations of immigrants, primarily Eastern and Southern European, who relocated to America to work at the steel mill in the late 19th and early 20th centuries.

In the 1870s, a land grant was obtained for the development of a company town first called Bessemer and later renamed Minnequa. The steel mill hired a doctor to establish a hospital at Furnace Street and Elm Street. The original facility merged with St. Mary's Hospital, forming the current St. Mary-Corwin Hospital.



### **Company Houses in the Bessemer Neighborhood**

Boardinghouses catering to single men were located along Northern Avenue; however, the neighborhood was primarily a family community. Development within the neighborhood was centered around various ethnic groups that settled near grocery stores whose owners were of the same nationality. Development patterns are closely associated with the construction of the steel mill and smelters and are reflective of the arrival date of each ethnic group. Banks, clothing and furniture stores, saloons, and grocery stores were amenities in the larger portion of the neighborhood, making it a self-sufficient community.

The diverse cultural heritage of the Bessemer Neighborhood is not well represented in the area's architecture. The housing stock was originally developed by the steel company housing division to house steel mill workers. The homes were not owned by the steel mill; rather, they were built by the company and sold to workers. As a result, many of the homes are small, generic, single-story structures. Approximately 50 percent of the housing was constructed before 1940, and an estimated 87 percent of the homes were constructed before 1970.

The construction of I-25 in the 1950s created a barrier within the community and divided the neighborhood, leaving a small portion of the Bessemer Neighborhood to the east of I-25 and north of the steel mill, known today as Eiler Heights. Unlike in the Grove Neighborhood, Eiler Heights was divided but not isolated, and the community has worked hard to maintain connections across I-25. Property acquisition for the original construction of I-25 through the Bessemer Neighborhood was minimized, leaving the remaining residents with their backyards immediately adjacent to the highway. Other residents must enter their homes from the alley because their streets were removed for construction of the highway.

The Bessemer Neighborhood is primarily residential. Aside from grocery shopping, gasoline, and fast food establishments, residents generally patronize businesses elsewhere in Pueblo.

Community resources in the Bessemer Neighborhood include Benedict Park (discussed further in **Section 3.3 Parks and Recreation**), Lake Minnequa (with access from Lake Avenue), St. Mary-Corwin Medical Center (Lake Avenue and Minnequa Avenue), the Bessemer Historical Society and Historical Library (located at the corner of Abriendo Avenue and Canal Street in the Main Administrative Complex and Dispensary of the CF&I Steel Mill), St. Mary's Genealogy Center (located in the old St. Mary's School at Mesa Avenue and Taylor Avenue), Fire Station #3 (123 W. Evans Avenue), Fire Station #4 (1201 E. Evans Avenue), Minnequa Elementary School, Corwin International Magnet School, Bessemer Academy, and Central High School. Each school has attendance boundaries that fall adjacent to or cross I-25 and depend on Northern Avenue and Mesa Avenue for access across I-25.

### **South Gate Neighborhood**

The South Gate Neighborhood is located to the south of the Bessemer Neighborhood and encompasses Pueblo Boulevard and I-25. The land adjacent to I-25 consists primarily of commercial (such as, storage, truck rental, and auto parts), industrial, vacant land, and small pockets of residential development. There are a few hotels and retail services at the Pueblo Boulevard/I-25 interchange.

Community facilities in the South Gate Neighborhood include JJ Raigoza Park (discussed further in **Section 3.3 Parks and Recreation**), South Park Elementary School, and Beulah Heights Elementary School. The attendance boundaries for the schools fall adjacent to I-25, and no students are required to cross I-25.

### 3.6.1.3 Environmental Justice

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

—Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, 1994.

There are three fundamental environmental justice principles:

- ❖ To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects (including social and economic effects) on minority and low-income populations.
- ❖ To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- ❖ To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations (FHWA, 2000).

The purpose of an environmental justice analysis is to determine whether a project will have a disproportionately high and adverse effect on minority and low-income populations. To accomplish this, the analysis must first evaluate whether impacts from the project would be predominantly borne by minority and low-income populations. It must then factor in off-setting benefits and proposed mitigation to determine whether impacts to these populations are disproportionately high and adverse. This analysis is presented in Section 3.6.3.



**Bessemer Historical Society and Historical Library**

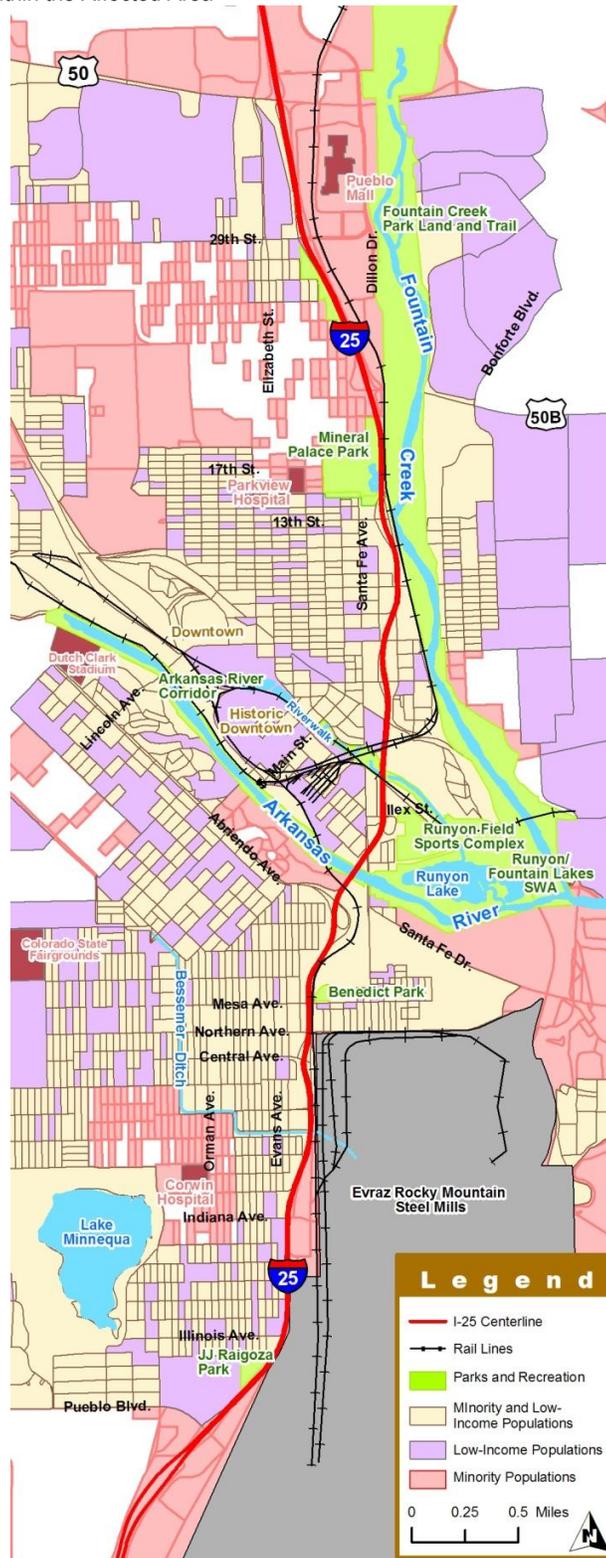
### Minority Populations

As defined in FHWA Order 6640.23, a minority is a person who is Black, Hispanic, Asian American, or an American Indian or Alaskan Native. Year 2010 U.S. Census Bureau data at the Census Block<sup>1</sup> level were used to evaluate minority populations. In accordance with *CDOT's Title VI and Environmental Justice Guidelines for NEPA Projects* (CDOT, 2004), minority populations are identified in locations where the minority population of the affected area (defined as Census Blocks within 0.5 mile of either Build Alternative) is greater than the minority population in the general population or other appropriate unit of geographical analysis (in this case, Pueblo County). In Pueblo County, 46 percent of the population is minority. This is substantially higher than the State of Colorado, which has an overall minority population of 30 percent.

Within the affected area, minorities represent approximately 74 percent of the total population. The minority population exceeds 46 percent in 2,012 of the 2,716 Census Blocks within 0.5 mile of the corridor. Minority populations are shown in **Exhibit 3.6-2**.

<sup>1</sup> Census Blocks are areas bounded on all sides by visible features, such as streets, roads, streams, and railroad tracks, and by invisible boundaries, such as city, town, township, and county limits, and property lines. Generally, Census Blocks are small in area; for example, a block bounded by city streets. However, Census Blocks in remote areas may be large and irregular.

**EXHIBIT 3.6-2**  
 Minority and Low-Income Populations within the Affected Area



Sources: U.S. Census Bureau 2010 Redistricting Data Summary File; U.S. Census Bureau 2005-2009 American Community Survey Data; U.S. Department of Housing and Urban Development Federal Year 2011 Section 8 Income Limits.

A large number of households within the affected area (as high as 15 percent in one Census Tract<sup>2</sup>) are linguistically isolated, meaning that no person over 14 years of age in the household speaks English “very well.” Within the affected area, nearly all Census Tracts had more linguistically isolated households than either the City or County, where 3.75 percent and 3.12 percent, respectively, of households do not have any members that speak English “well.”

#### **Low-Income Populations**

FHWA Order 6640.23 defines low-income as “...a household income at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.” A different threshold (such as, U.S. Census Bureau poverty threshold or Housing and Urban Development [HUD] Community Development Block Grant income thresholds) may be used as long as it is not selectively implemented and is inclusive of all persons at or below the HHS poverty guidelines. CDOT’s recommended approach in determining low-income populations is to derive the low-income threshold from a combination of census average household size data at the Census Block Group<sup>3</sup> level and income limits set annually by HUD for the distribution and allocations of Community Development Block Grant funds. The low-income threshold established for this project using 2011 HUD income limits is \$20,000 per year.

Low-income populations are identified where the percentage of low-income households (households earning less than \$20,000 per year) within the affected area (defined as Census Block Groups within 0.5 mile of either Build Alternative) is greater than the percentage of low-income households in the general population or other appropriate unit of geographical analysis (in this case, Pueblo County). In Pueblo County, 24 percent of households are low-income.

Approximately 50 percent of the households in the affected area are low-income. The number of low-income

<sup>2</sup> Census Tracts are small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau’s Participant Statistical Areas Program. Census Tracts generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

<sup>3</sup> Census Block Groups are clusters of Census Blocks within a Census Tract. Census Block Groups generally contain between 600 and 3,000 people, with an optimum size of 1,500 people.

households exceeds 24 percent in 73 of the 147 Census Block Groups within 0.5 mile of the corridor. Low-income populations are shown in **Exhibit 3.6-2**. Low-income populations are most concentrated (exceeding 50 percent of all households) in the Downtown, Grove, and Bessemer neighborhoods.

#### **Minority-Owned Businesses**

In 2007, CDOT interviewed 44 business owners along the corridor to provide information about the project, identify potential impacts, and identify any environmental justice issues. The majority of businesses within the corridor are well-established and can generally be characterized as highly stable. Of the businesses that were interviewed, nearly 75 percent employed one or more minority workers, which is reflective of minority composition within the affected area; however, the majority of these businesses (36 out of 44) are not minority-owned and 66 percent had no poverty-level wage (less than \$9.25 per hour in 2007) employees.

#### **Public Involvement and Outreach to Minority and Low-Income Populations**

Extensive public involvement, including the organization of Community Working Groups, was conducted throughout the project planning process to identify important neighborhood features, evaluate the impacts of the Build Alternatives on community cohesion, and highlight where the Build Alternatives could be modified to better fit within the context of the neighborhoods. The Community Working Groups helped to shape the alternatives, reducing impacts within neighborhoods and identifying opportunities to make the transportation system function more effectively within neighborhoods and enhance community facilities.

Early in the development of the project, the CDOT Project Team determined that the entire length of the project area touches neighborhoods of minority and/or low-income populations. The public involvement program included specialized outreach to these populations. The intent of these efforts was to encourage minority and low-income populations to identify issues that should be addressed before they become complaints; provide easy access to project information and CDOT Project Team members; and provide opportunities throughout the project for meaningful involvement in the choice among alternatives, location of

roadway features, and development of designs and mitigating measures.

Nearly all of the non-English speaking households in the affected area are Spanish-speaking; therefore, all project announcements were available in Spanish, and translators were available upon request for all neighborhood meetings. Many of the public involvement techniques employed for this project were designed with non-English speakers in mind. For example, invitations to meetings were sent in Spanish and English, meetings were advertised in the Spanish language newspaper, posters were displayed in neighborhood stores to advertise public events, flyers were hand-delivered to announce neighborhood-focused or issue-focused meetings, and meetings were announced on billboards in the project area. As the project progressed, feedback indicated that language was less of a barrier for participants than the technical nature of the information, and more emphasis was placed on presenting information in workshops and smaller group settings.

Outreach to low-income populations included conducting interviews with social services and community planning organizations to find effective ways to reach out to low-income citizens. Flyers and brochures were distributed to local charities that serve low-income residents, such as Meals on Wheels. Other recommendations that were adopted included holding meetings in consistent and convenient community locations at times that were convenient for working families, as well as expanding public outreach to established community events. Meetings were held in schools, churches, and community gathering centers throughout the corridor, and the project team set up booths in planned community events, such as the “Pack the Park” celebration in the Bessemer Neighborhood.

Twenty-three neighborhood workshops were held to provide neighborhood residents a forum to discuss issues affecting where they live, work, and play. One of the workshops was conducted in the Grove Neighborhood to discuss the possible acquisition of properties for the I-25 realignment. In the early 1900s, the Grove Neighborhood had a cohesive organization. Residents worked in the nearby steel mill, meatpacking houses, or on the railroads that served Pueblo and shopped at local neighborhood stores. The organization of the neighborhood was altered substantially by the Arkansas River flood of 1921 and the construction of

I-25 in the 1950s. Much of the cohesive structure was lost in the eastern portion of the neighborhood, where only 34 homes were left and connections to the western portion of the neighborhood were severed. Today, the 34 homes in the eastern portion of the Grove Neighborhood remain isolated from other residential and commercial areas and are surrounded by I-25 to the west and the Runyon Field Sports Complex to the east.

As shown in the detailed alternative maps (**Appendix E**) (Station 287 to 302), the Modified I-25 Alternative (Preferred Alternative) would directly impact all but one of the properties between Moffat Street and Stanton Avenue in the Grove Neighborhood. Because of the constraints surrounding this portion of the neighborhood (rail lines, the Runyon Field Sports Complex, and the Runyon/Fountain Lakes State Wildlife Area), only four or five structures west of the relocated highway (between Santa Fe Avenue and I-25) and one or two structures east of the relocated highway (between I-25 and Stanton Avenue) could potentially be avoided. However, these residences would be further isolated and surrounded by transportation infrastructure. Such a small number of residences would not be able to support a functioning neighborhood structure.

At the neighborhood workshop, the attendees agreed that they would prefer that all 34 homes in the eastern portion of the Grove Neighborhood be acquired, even if the project required acquisition of fewer homes (as would occur under the Existing I-25 Alternative). The group noted that leaving only a few homes in the eastern half of the neighborhood would degrade and further isolate the neighborhood, worsening the impacts of the original I-25 construction. This input was vital in the development of the Modified I-25 Alternative (Preferred Alternative), which would acquire all 34 homes instead of leaving a few along either side of the relocated highway.

At another neighborhood workshop, the residents of the east Bessemer Neighborhood voiced concerns about original plans for the I-25 realignment (the Existing I-25 Alternative) that would cause them to lose Santa Fe Avenue as a direct route to the downtown area. This concern prompted designers to “go back to the drawing board” and look for other solutions. The result is a proposed extension of Stanton Avenue, including a new bridge over the Arkansas River, included as an element of the Modified I-25

Alternative (Preferred Alternative). The new road would provide a direct route to downtown and greatly improve access to the Runyon Field Sports Complex.

During the 45-day public comment period for the Draft Environmental Impact Statement (DEIS), representatives from Eiler Heights expressed concern over impacts to their community, in particular, the number of property acquisitions that would be required south of Mesa Avenue. CDOT and the City of Pueblo met with representatives from the community in January 2012 and February 2012 to discuss these concerns and identify additional mitigation measures, which are documented at the end of Section 3.6.4 Mitigation.

In the North Side Neighborhood, residents of the neighborhood surrounding Mineral Palace Park, along with citizens throughout the Pueblo region, expressed a strong commitment to protecting the park. Through a series of public meetings, citizens were active participants in the development of mitigation strategies to address the impacts expected from widening I-25 next to Mineral Palace Park. To ensure mitigation strategies were not eliminated or scaled back due to costs to the project, the citizens developed a resolution that was passed by City Council stating adherence to these commitments.

In conjunction with the project, CDOT created [www.EverybodyLovesARoadTrip.com](http://www.EverybodyLovesARoadTrip.com), an interactive website that will teach 4th, 5th, and 6th graders (the future users of the highway) more about the development of roads and highways. The project demonstrates how social, community, and biological issues influence transportation and is currently in use in 5th grade classrooms in Pueblo.

CDOT will continue to conduct public involvement activities throughout the life of the New Pueblo Freeway project, through final design and construction activities. More information regarding the extensive public involvement effort for this project can be found in **Chapter 6 – Comments and Coordination**.

## 3.6.2 Environmental Consequences

### 3.6.2.1 No Action Alternative

Under the No Action Alternative, population growth would likely occur at rates that are consistent with DOLA forecasts (DOLA, 2009). The No Action Alternative would not impact

any community facilities within the corridor and would not affect community cohesion. Areas where the original construction of I-25 bisected neighborhoods and residential properties would remain unchanged, and I-25 would continue to be a community barrier. The residential area east of I-25 in the Grove Neighborhood and Goat Hill would remain isolated. In most locations along the corridor, noise levels would increase as a result of changes in traffic volumes and speeds on I-25. The predicted change in noise levels between the current condition and 2025 are detailed in **Section 3.5 Noise**. Because every neighborhood adjacent to I-25 contains minority and/or low-income populations, these impacts would be predominantly borne by these populations.

### 3.6.2.2 Build Alternatives

Impacts to social resources, economic conditions, and environmental justice are described below for each area of the corridor. All property acquisition and relocation shall comply fully with federal and state requirements, including Uniform Act defined previously in **Section 3.4 Right-of-Way and Relocations**.

#### *North Area (Phase 1)*

Both Build Alternatives would provide safer and more efficient access to I-25 from areas surrounding the highway but would not introduce new transportation infrastructure to areas that do not already have access. Population trends would not be influenced by either Build Alternative, and growth would occur as forecasted.

Both Build Alternatives would require the relocation of 16 minority and low-income residences from within the Goat Hill area. This represents approximately 15 percent of the housing stock in this area (there are approximately 108 residences in the Goat Hill Area).

Both Build Alternatives would relocate 25 businesses and more than 300 jobs in the North Area (Phase 1) (less than 1 percent of the total employment in Pueblo County). According to the business survey conducted by CDOT, the majority of these businesses are not minority-owned and do not play a critical role in the functioning of the community; that is, mainly auto repair shops, fast food establishments, and car dealerships would be affected and there are many of these throughout the corridor. Many of these businesses employ full-time employees and have specific property

considerations such as the need to be near the interstate for access, visibility, or service to the existing neighborhood. As indicated in **Section 3.4 Right-of-Way and Relocations**, there are considerable vacant and available commercial properties throughout the corridor that could serve as relocation sites. If these businesses are not relocated within Pueblo, tax revenues could decrease and the jobs they provide could be permanently lost.

A few businesses displaced by the project may not reopen at new locations. Employees working for businesses that do not reestablish would lose their jobs. Some of these employees would likely be minorities. Relocation could also result in labor reductions if the business is not as successful at its new location. Businesses relocating out of the neighborhood in which employees reside could also impact employees by making it more difficult to get to work.

Project construction would generate direct and indirect employment opportunities, and the local economy would benefit from the spending associated with construction.

Both Build Alternatives would directly impact community facilities in the North Side, East Side, and Downtown neighborhoods. Many of these facilities are used by residents throughout Pueblo, and loss of these facilities would affect the general population, including minority and low-income residents.

In the North Side and East Side neighborhoods, minority and low-income populations would benefit from improved access and neighborhood connections. Minority and low-income residents would also benefit from improved access to the Downtown Neighborhood and the Parkview Medical Center (with the new ramp at 13th Street).

Construction of the Build Alternatives would require the acquisition of property from Mineral Palace Park, as discussed in **Section 3.3 Parks and Recreation** and **Chapter 4 – Section 4(f) Evaluation**. Mitigation includes a restoration plan that would increase the size of the park and restore historic features and neighborhood connections, ultimately benefiting the surrounding community, which consists primarily of minority and low-income residents.

Both Build Alternatives would enhance community cohesion in minority and low-income areas by improving access for motorists and pedestrians. The extension of Dillon Drive to

the south would improve local access to the Pueblo Mall and regional retail destinations for the North Side and East Side neighborhoods. In addition, it would shift onto local roads some of the drivers who are currently using I-25 for local trips. This would reduce the traffic load on I-25 and the potential for accidents since fewer vehicles would be entering, exiting, and changing lanes on the highway. Access would be provided to the land west of the Dillon Drive extension, allowing for commercial development and keeping regional retail in these neighborhoods. Construction of pedestrian trails along I-25 to the north and south and across I-25 near Mineral Palace Park would provide an additional connection for the residents of the North Side and East Side neighborhoods. This would allow North Side Neighborhood residents to visit the Pueblo Mall on foot and bicycle and would connect the East Side Neighborhood to Mineral Palace Park, the North Side Neighborhood, and the Downtown Neighborhood.

In the Downtown Neighborhood, both Build Alternatives construct a split-diamond interchange that would move highway ramps to arterials rather than local streets; provide continuous, organized, and improved access to the downtown street network; improve signage; and create a gateway to the neighborhood at 14th Street. The construction of the northbound frontage road would require that Bradford Avenue be made into a cul-de-sac on both ends and acquisition of 16 homes in Goat Hill.

Goat Hill is an isolated area (63 acres) with boundaries that were defined by the original construction of I-25 (separating it from the larger Downtown Neighborhood) and Fountain Creek. It contains a mixture of residential, commercial, industrial, and public land uses. Residences in this area are primarily single-family homes, of which more than half are occupied by renters. Public uses are associated with almost 25 percent of the land area (approximately 16 acres), the majority in the Fountain Creek Corridor. As noted in **Section 3.8 Land Use**, this area is under-developed and has been identified for re-development. Approximately 20 percent of the parcels in this area are vacant.

The acquisitions resulting from either Build Alternative would further isolate and alter the composition of the Goat Hill area as residences are relocated and replaced with transportation infrastructure. However, the diversity and distribution of land uses would persist, the majority of homes

would remain, and residents would continue to be concentrated between Bradford Street and Chester Avenue. Kelly Avenue would be extended from Santa Fe Avenue into Goat Hill, providing a second access point to the neighborhood. These features would improve neighborhood safety, reduce neighborhood through traffic, and foster a sense of community.

Detours, traffic delays, and access revisions would inconvenience residents, businesses, and community facilities during project construction.

#### **South Area (Phase 2)**

No residential properties would be acquired in the South Area (Phase 2) under either Build Alternative. Population trends would not be influenced by either alternative, and growth would occur as forecasted.

Both Build Alternatives would relocate four businesses and more than 62 jobs in the South Area (Phase 2). According to the business survey conducted by CDOT, the majority of the affected businesses are not minority-owned, do not play a critical role in the functioning of the community, and are not of unique importance to minority or low-income residents. If these businesses are not relocated within Pueblo, tax revenues could decrease and the jobs they provide could be permanently lost. Employees working for businesses that do not reestablish would lose their jobs. Some of these employees would likely be minorities.

Project construction would generate direct and indirect employment opportunities, and the local economy would benefit from the spending associated with construction.

Neither Build Alternative would impact community cohesion in the South Gate Neighborhood and the southern portion of the Bessemer Neighborhood. Community facilities in the South Area (Phase 2) would benefit from the construction of pedestrian trails connecting JJ Raigoza Park to neighborhoods as far north as the North Side Neighborhood.

Detours, traffic delays, and access revisions would inconvenience residents, businesses and community facilities during construction.

#### **Central Area (Phase 2)**

##### *Existing I-25 Alternative*

Population trends would not be influenced by the Existing I-25 Alternative, and growth would occur as forecasted. An estimated 71 residential properties in the Central Area (Phase 2) would need to be acquired for the construction of the Existing I-25 Alternative. All of these homes are located in minority and low-income portions of the Bessemer Neighborhood.

At one time, the Bessemer Neighborhood had a tight social fabric with strong connections among neighborhood development, traditional ethnic groups, and the employment provided by the former CF&I Steel Mill. These connections began to break down after the steel mill closed and the relationship between the neighborhood and its largest employer was diminished. The neighborhood retains many of its historic residences and churches, but the composition of its population has changed. Once dominated by Eastern and Southern European immigrants, the neighborhood is now predominantly Hispanic (60 percent of the population). In 2004, the City adopted the *Bessemer Neighborhood Plan*. This plan was developed in response to the lack of reinvestment in the community and identifies a framework for revitalization that incorporates the proposed improvements to I-25. The residential acquisitions resulting from the Existing I-25 Alternative would impact a very small portion of the Bessemer Neighborhood (primarily east of I-25 south of Benedict Park and west of I-25 south of the Arkansas River) and would not hinder the implementation of the *Bessemer Neighborhood Plan*.

Under the Existing I-25 Alternative, 36 residential properties east of I-25 in the area known as Eiler Heights would be acquired to accommodate the eastern shift of the interstate lanes, the frontage road, and the realignment of the railroad.

Community cohesion would be improved in the Bessemer Neighborhood by reconnecting local roadway and trail systems, restoring the east-west neighborhood connectivity that was severed when I-25 was built. Abriendo Avenue would be connected to Santa Fe Drive, restoring east-west connectivity in the neighborhood that was severed by the construction of I-25. The connections between I-25 and local neighborhood streets at Central Avenue, Minnequa Avenue, and Illinois Avenue would be removed and replaced with connections to major roadways, including

Abriendo Avenue, Northern Avenue, and Indiana Avenue, providing better east-west connectivity for highway users and reserving neighborhood streets for local traffic.

Regional pedestrian connectivity through the Bessemer Neighborhood would be improved with the construction of a trail “backbone” system that would connect JJ Raigoza Park in the south to destinations to the north such as HARP, the Runyon Field Sports Complex, and Mineral Palace Park. The trails would cross I-25 at Mesa Avenue, providing additional east-west connectivity within the neighborhood for pedestrians in minority and low-income neighborhoods.

The Existing I-25 Alternative would relocate 30 businesses in the Central Area (Phase 2), affecting more than 186 employees. According to the business survey conducted by CDOT, the majority of the affected businesses are not minority-owned, do not play a critical role in the functioning of the community, and are not of unique importance to minority or low-income residents. Many of these businesses employ full-time employees and have specific property considerations such as industrial zoning or the need to be near the highway for access, visibility, or service to the existing neighborhood. As indicated in **Section 3.4 Right-of-Way and Relocations**, there are considerable vacant and available commercial properties throughout the corridor that could serve as relocation sites. If these businesses are not relocated within Pueblo, tax revenues could decrease and the jobs they provide could be permanently lost.

A few businesses displaced by the project may not reopen at new locations. Employees working for businesses that do not reestablish would lose their jobs. Some of these employees would likely be minorities. Relocation could also result in labor reductions if the business is not as successful at its new location. Businesses relocating out of the neighborhood in which employees reside could also impact employees by making it more difficult to get to work.

Project construction would generate direct and indirect employment opportunities, and the local economy would benefit from the spending associated with construction.

The Existing I-25 Alternative would directly impact community facilities in the Central Area (Phase 2). The construction of a split-diamond interchange between Abriendo Avenue and Northern Avenue would require the acquisition of ROW from Benedict Park as discussed in

**Section 3.3 Parks and Recreation and Chapter 4 – Section 4(f) Evaluation.** Mitigation proposed for the Existing I-25 Alternative would split Benedict Park into two areas across Mesa Avenue.

Community cohesion in the Grove Neighborhood would not be impacted under the Existing I-25 Alternative. Vehicle access into the Grove Neighborhood would remain unchanged, and limited improvements would be made to trail system connections from the neighborhood. Connectivity across I-25 would remain severed for motorists and pedestrians. The pocket of homes in the east Grove Neighborhood that were isolated by the original construction of I-25 would continue to be isolated.

Detours, traffic delays, and access revisions would inconvenience residents, businesses, and community facilities during construction.

*Modified I-25 Alternative (Preferred Alternative)*

Population trends would not be influenced by the Modified I-25 Alternative (Preferred Alternative), and growth would occur as forecasted. An estimated 101 residential properties in the Central Area (Phase 2) would need to be acquired for the construction of the Modified I-25 Alternative (Preferred Alternative). Sixty-seven of these homes are located in minority and low-income portions of the Bessemer Neighborhood. Residential acquisitions would be concentrated south of Benedict Park between Mesa Avenue and Northern Avenue in the area known as Eiler Heights. As with the Existing I-25 Alternative, the residential acquisitions resulting from the Modified I-25 Alternative (Preferred Alternative) would impact a very small portion of the Bessemer Neighborhood overall.

Under the Modified I-25 Alternative (Preferred Alternative), 56 residential properties would be acquired east of I-25 in the Bessemer Neighborhood area known as Eiler Heights. This represents 20 additional residential properties, or an additional 14 percent of the neighborhood, than would be acquired under the Existing I-25 Alternative. The impact to this area is greater under the Modified I-25 Alternative (Preferred Alternative) because the alignment is elevated in this area to avoid the UPRR. The Mesa Avenue and Northern Avenue overpasses would rise further to the east, requiring the closure of Taylor Avenue and the acquisition of the additional half block of homes east of Taylor Avenue.

The Modified I-25 Alternative (Preferred Alternative) would relocate 35 businesses and a group of newly constructed warehouses in the Central Area (Phase 2), affecting more than 209 employees. According to the business survey conducted by CDOT, the majority of the affected businesses are not minority-owned, do not play a critical role in the functioning of the community, and are not of unique importance to minority or low-income residents. Many of these businesses employ full-time employees and have specific property considerations such as industrial zoning or the need to be near the highway for access, visibility, or service to the existing neighborhood. As indicated in **Section 3.4 Right-of-Way and Relocations**, there are considerable vacant and available commercial properties throughout the corridor that could serve as relocation sites. If these businesses are not relocated within Pueblo, tax revenues could decrease and the jobs they provide could be permanently lost.

As with the Existing I-25 Alternative, a few businesses displaced by the project may not reopen at new locations. Employees working for businesses that do not reestablish would lose their jobs. Some of these employees would likely be minorities. Relocation could also result in labor reductions if the business is not as successful at its new location. Businesses relocating out of the neighborhood in which employees reside could also impact employees by making it more difficult to get to work.

Project construction would generate direct and indirect employment opportunities, and the local economy would benefit from the spending associated with construction.

The Modified I-25 Alternative (Preferred Alternative) would directly impact community facilities in the Central Area (Phase 2) by shifting the highway onto park property at the Runyon/Fountain Lakes State Wildlife Area and completely acquiring Benedict Park, as described in **Section 3.3 Parks and Recreation** and **Chapter 4 – Section 4(f) Evaluation**. However, access to the Runyon Field Sports Complex would be improved, allowing visitors to access the facility using the extended Stanton Avenue, a local road, rather than from the off-ramp of I-25. In addition, mitigation proposed for Benedict Park would result in the construction of a new, larger, and contiguous park that would provide a greater benefit to the surrounding community than the

Existing I-25 Alternative, which can only mitigate for park impacts by expanding the park across Mesa Avenue.

Shifting I-25 east would acquire 34 residences in the east Grove Neighborhood, completely removing the pocket of homes that was isolated when I-25 was built. The majority of Grove Neighborhood residents prefer the acquisition of all 34 homes rather than leaving only a few homes, which would degrade and further isolate the neighborhood and worsen the impacts of the original I-25 construction. Section 3.6.1.3 provides a summary of the workshop held in the Grove Neighborhood.

The realignment of I-25 would make it possible to substantially increase both north-south and east-west connectivity throughout the Central Area (Phase 2). Santa Fe Avenue would be extended south of the Arkansas River to Minnequa Avenue. This extension would allow residents to use a local roadway to travel from neighborhoods in the south to the Downtown Neighborhood and North Side Neighborhood instead of having to rely on I-25. The extension would also provide a much-needed additional local street crossing of the Arkansas River (reconnecting Santa Fe Avenue to Abriendo Avenue) and would restore the local street network that was severed when I-25 was built. This extension is not possible under the Existing I-25 Alternative.

Additional connectivity to the north and south is provided by 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 Neighborhood and Downtown Neighborhood. The Stanton Avenue connection was developed directly from community input and reflects the public's desire to avoid the use of I-25. It also adheres to the City's long-range plans, which show Stanton Avenue connecting to D Street. Property acquisition required for the shift in I-25 alignment under the Modified I-25 Alternative (Preferred Alternative) makes this extension possible. The overall impact of the Santa Fe Avenue and Stanton Avenue extensions would reestablish a grid system that improves emergency access, reconnects minority and low-income neighborhoods, and improves neighborhood cohesion.

Regional pedestrian connectivity would be improved through a trail “backbone” system, as described for the Existing I-25 Alternative. In addition, the Modified I-25 Alternative (Preferred Alternative) would improve pedestrian access in the Grove Neighborhood through the construction of trails and the new street grid network.

Detours, traffic delays, and access revisions would inconvenience residents, businesses, and community facilities during construction.

### 3.6.2.3 Indirect Effects

Indirect effects from the project improvements are related to the potential for higher traffic volumes on local roads, construction, and acquisitions in proximity to known concentrations of minority and low-income populations. These indirect impacts are outlined in their respective discipline sections: **3.1 Transportation**, **3.4 Right-of-Way and Relocations**, and **3.5 Noise**). Modest beneficial impacts to neighborhoods in the I-25 corridor could result from improved non-motorized accessibility and reduced delay in providing emergency services.

### 3.6.3 Considerations for Environmental Justice

The impact analysis for all resources was reviewed to determine whether either Build Alternative would result in adverse effects on all segments of the population, including minority and low-income populations. If no adverse effects were identified for a resource, no further environmental justice analysis was undertaken with regards to that particular resource. Elements of the Build Alternatives that would benefit minority and low-income communities and offset adverse effects were also considered. These benefits are discussed following **Exhibit 3.6-3**. Adverse effects were identified for the resources presented in **Exhibit 3.6-3**. Effects relevant to the environmental justice analysis are listed below; these effects would occur under either Build Alternative:

- ❖ Residential and commercial acquisitions and associated impacts to employment.

- ❖ Impacts to park and recreational resources, in particular Mineral Palace Park and Benedict Park.
- ❖ Increase in noise levels in some locations (in the absence of mitigation).
- ❖ Visual impacts resulting from the installation of retaining walls, noise barriers, structures, and other project elements.
- ❖ Disturbance of hazardous or potentially hazardous waste sites.
- ❖ Temporary construction-related impacts may include an increase in noise, detours, traffic delays, disruption in utility service, and exposure to particulate emissions (diesel emissions and fugitive dust).

People most at risk from inhaling particulate emissions during construction are children, the elderly, and the health-impaired. Healthy individuals who work or spend substantial amounts of time outdoors can also be affected by prolonged dust exposure.

The potential health effects of inhaling particulate matter generated by construction activities typically confined to localized areas where the ground is disturbed with earth-moving excavations and hauling of materials can kick up road dust (re-entrainment) and are temporary in duration. The potential health effects of inhaling particulate concentrated or prolonged emissions include irritation to the eyes, nose, and throat; respiratory distress, including coughing, difficulty breathing, and chest tightness; increased severity of bronchitis, asthma, and emphysema; and aggravated heart conditions.

Because all of the project improvements would occur in areas with minority and/or low-income populations, construction-related dust and diesel emissions would most likely affect these populations under either Build Alternative. As described in **Exhibit 3.6-3**, the CDOT Project Team has incorporated mitigation measures, enhancements, and offsetting benefits to reduce the intensity of dust and emissions and avoid disproportionately high and adverse effects. These measures are described below.

## EXHIBIT 3.6-3

## Environmental Justice Analysis

Summary of Impacts from the Build Alternatives	Are Impacts Predominantly Borne by Minority/Low-Income Populations?	Are Impacts to Minority/Low-Income Populations Considered Disproportionately High and Adverse?
<b>SOCIAL RESOURCES AND ECONOMIC CONDITIONS</b>		
<ul style="list-style-type: none"> <li>❖ Changes in the transportation network to restore east-west and north-south connectivity, improve neighborhood cohesion, and provide local network redundancy. The impacts apply to both Build Alternatives, although the impact is greater under the Modified I-25 Alternative (Preferred Alternative) as a result of the extension of both Stanton Avenue and Santa Fe Avenue.</li> <li>❖ Acquisition of residences from the Goat Hill area (16 under either Build Alternative), the Bessemer Neighborhood (71 under the Existing I-25 Alternative and 67 under the Modified I-25 Alternative [Preferred Alternative]), and the Grove Neighborhood (34 under the Modified I-25 Alternative [Preferred Alternative]).</li> <li>❖ Acquisition of businesses (58 under the Existing I-25 Alternative and 65 under the Modified I-25 Alternative [Preferred Alternative]) and impacts to up to 600 jobs under either alternative.</li> <li>❖ Generation of direct and indirect employment during construction under both Build Alternatives.</li> </ul>	<p><b>Yes.</b> All residential and commercial acquisitions would be from minority and low-income neighborhoods.</p>	<p><b>No.</b> Minority and low-income residents would benefit most from restored neighborhood connections and improvements in neighborhood cohesion. CDOT would mitigate property acquisitions and relocation effects by purchasing properties identified for acquisition and providing relocation assistance to displacees. In some cases, property owners prefer acquisition (e.g., in the Grove Neighborhood). The majority of businesses affected by either Build Alternative (Preferred Alternative) are not minority-owned or of particular importance to minority or low-income populations. Local residents would benefit from additional employment opportunities and the indirect spending associated with construction. CDOT's disadvantaged business enterprise (DBE) program provides a vehicle for increasing the participation of minority businesses in project construction contracts. Typically, the goal for DBE participation is identified during the bidding stage of a construction project.</p>
<b>PARKS AND RECREATION</b>		
<ul style="list-style-type: none"> <li>❖ Acquisition of property from park and recreational resources, in particular, Mineral Palace Park, Fountain Creek Park Land, and Benedict Park under both Build Alternatives. Impacts to Benedict Park would differ; the Existing I-25 Alternative would acquire 0.42 acre of the park and the Modified I-25 Alternative (Preferred Alternative) would acquire the entire 1.92 acre park.</li> <li>❖ Potential increase in noise levels at Mineral Park, JJ Raigoza Park, and the detention ponds between 29th Street and 24th Street under both Build Alternatives.</li> <li>❖ Improved access to the Runyon Field Sports Complex under the Modified I-25 Alternative (Preferred Alternative).</li> </ul>	<p><b>Yes.</b> The general population of park users would experience some impacts, but impacts would be greatest for the minority and low-income residents adjacent to the project corridor.</p>	<p><b>No.</b> Mitigation proposed for impacts to parks and recreational resources would enhance the parks system. Mineral Palace Park would increase in size, and historic features and neighborhood connections to the park would be restored. A new pedestrian trail would be constructed between JJ Raigoza Park in the South Gate Neighborhood to the North Side Neighborhood. Benedict Park would be reconstructed under both Build Alternatives, with the Modified I-25 Alternative (Preferred Alternative) providing a larger contiguous park. After construction of noise walls, noise levels at Mineral Palace Park, JJ Raigoza Park, and the detention ponds between 29th Street and 24th Street would be lower than current levels. Minority and low-income residents within the corridor would benefit most from these measures.</p>

**EXHIBIT 3.6-3**

## Environmental Justice Analysis

Summary of Impacts from the Build Alternatives	Are Impacts Predominantly Borne by Minority/Low-Income Populations?	Are Impacts to Minority/Low-Income Populations Considered Disproportionately High and Adverse?
<b>NOISE</b>		
<ul style="list-style-type: none"> <li>❖ Increases in noise levels for the design year up to 7 dBA over 2003 existing levels under both Build Alternatives.</li> </ul>	<p><b>Yes.</b> All of the noise impacts would occur in the minority and low-income neighborhoods adjacent to the project corridor.</p>	<p><b>No.</b> Mitigation for noise impacts (walls and berms) would reduce noise levels for some residents, and in some locations noise levels after construction would be lower than current levels.</p>
<b>VISUAL</b>		
<ul style="list-style-type: none"> <li>❖ Visual impacts resulting from the installation of retaining walls, noise barriers, structures, and other project elements under both Build Alternatives.</li> </ul>	<p><b>Yes.</b> While these elements would be dispersed throughout the project corridor and would affect the travelling public, impacts would be greatest for the minority and low-income residents adjacent to the project corridor.</p>	<p><b>No.</b> In some cases, aesthetics within the corridor would improve, benefiting local residents and off-setting adverse effects.</p>
<b>AIR QUALITY</b>		
<ul style="list-style-type: none"> <li>❖ No adverse air quality impacts are anticipated under both Build Alternatives. Temporary construction-related air quality impacts are addressed below.</li> </ul>	<p><b>No.</b> No adverse air quality impacts are anticipated.</p>	<p><b>No.</b> No adverse air quality impacts are anticipated.</p>
<b>CONSTRUCTION</b>		
<ul style="list-style-type: none"> <li>❖ Temporary construction-related impacts, such as an increase in noise, detours, traffic delays, disruption in utility service, and exposure to particulate emissions (diesel emissions and fugitive dust), under both Build Alternatives.</li> <li>❖ Under the Modified I-25 Alternative (Preferred Alternative), fewer major disruptions to the traveling public would be anticipated between Ilex Street and Nevada Avenue, where the highway would be constructed on a new alignment.</li> </ul>	<p><b>Yes.</b> While the general population would experience some impacts throughout construction, impacts would be greatest for the minority and low-income residents adjacent to the project corridor.</p>	<p><b>No.</b> The implementation of Best Management Practices, development of a construction monitoring plan for particulate emissions, and other mitigation measures implemented throughout construction would reduce the severity of these impacts so that remaining effects would no longer be considered high and adverse. In addition, the long-term benefits provided by the project would likely outweigh the remaining short-term effects during construction.</p>

Source: CH2M HILL, 2005b.

CDOT = Colorado Department of Transportation  
I-25 = Interstate 25

dBA = A-weighted decibel

Note: This analysis considers resources for which adverse effects have been identified. Impacts to natural resources (i.e., biological resources, wetlands, and floodplains) have been assumed not to have any direct impacts or indirect effects on human populations and are not included in this analysis.

Both Build Alternatives would improve safety and increase mobility and connectivity of Pueblo's transportation network. More than 10,000 feet of noise walls would be constructed, which would reduce noise impacts for some residents adjacent to the I-25 corridor. CDOT would also remediate hazardous waste sites disturbed by the project, which would lower health and safety risks. In some cases, the aesthetics of the corridor would improve.

Both Build Alternatives include changes in the transportation network that would restore east-west and north-south connectivity, improve neighborhood cohesion, and provide local network redundancy. These changes also help to alleviate some of the historic impacts that have occurred within minority and low-income neighborhoods as a result of the Arkansas River flood of 1921 and the original construction of I-25 in the 1950s. Local residents participated in the identification and development of many of these features.

To address the health effects of particulate emissions during construction, CDOT will coordinate with the Colorado Department of Public Health and Environment (CDPHE) to develop a construction monitoring plan. The monitoring plan will demonstrate how well the Preferred Alternative addresses construction-related particulate emissions by measuring the effectiveness of mitigation measures in controlling or minimizing adverse effects. For additional details regarding mitigation for air quality impacts, see **Section 3.10 Air Quality**.

Key project elements that improve the social and environmental justice environment are listed below.

- ❖ **Bridge Reconstruction at Mesa Avenue** – This overpass would be reconstructed as a local roadway facility with the intent of restoring connections between the Bessemer Neighborhood east and west of I-25. The new ramps that would be constructed at Northern Avenue would remain disconnected from Mesa Avenue to discourage regional and cut-through traffic. The new bridge would be wide enough to accommodate pedestrian uses and neighborhood activities, such as the local farmer's market. This improvement is illustrated in **Chapter 2 – Alternatives, Exhibit 2-30** (Existing I-25 Alternative) and **Exhibit 2-33** (Modified I-25 Alternative).
- ❖ **Reconstruction of Northern Avenue** – Northern Avenue would be shifted slightly south of its existing location. The new cross-section of the roadway would accommodate wide sidewalks, improving local pedestrian access across I-25 to Benedict Park on the east and local businesses on the west. A pedestrian plaza would be developed west of I-25 on the current alignment of Northern Avenue. Pedestrians would be able to access the new plaza directly from Northern Avenue. This improvement is illustrated in **Chapter 2 -Alternatives, Exhibit 2-30** (Existing I-25 Alternative) and **Exhibit 2-33** (Modified I-25 Alternative).
- ❖ **Mitigation for Impacts to Mineral Palace Park and Benedict Park** – Mitigation for impacts to Mineral Palace Park and Benedict Park under either Build Alternative would expand park and recreational resources and improve the quality of the adjacent neighborhoods. The reconstructed portion of Benedict Park south of Mesa Avenue would be safer because it would be surrounded by local streets. It would also be better integrated into the adjacent neighborhoods. This improvement is described and illustrated in **Section 3.3 Parks and Recreation, Exhibits 3.3-13, 3.3-15, and 3.3-18**.
- ❖ **Santa Fe Avenue Extension** – Under the Modified I-25 Alternative (Preferred Alternative), Santa Fe Avenue would be extended along the current I-25 alignment. This would improve north-south connectivity and would provide local network redundancy for neighborhoods in the south to the Downtown Neighborhood and North Side Neighborhood. A roundabout would be constructed at Central Avenue, which would provide a clear distinction between higher-traffic transportation infrastructure and local neighborhood streets. The roundabout would also serve as a gateway into the Bessemer Neighborhood, which would improve the visibility of and access to the Bessemer Historical Society. This improvement is illustrated in **Chapter 2 – Alternatives, Exhibit 2-33**.
- ❖ **Stanton Avenue Extension** – Stanton Avenue currently ends at Locust Street. The extension was designed to maintain a direct connection for the neighborhoods near Benedict Park to neighborhoods and services west of I-25 and improve access to the downtown area. The Stanton Avenue extension would be constructed only under the Modified I-25 Alternative (Preferred Alternative). This improvement is illustrated in **Chapter 2 – Alternatives, Exhibit 2-33**.

- ❖ **Trail Connections** – A new north-south trail would be constructed in the alley behind Evans Avenue between Minnequa Avenue and Illinois Avenue. For the trail to be built in this location, property owners would need to agree to give up their alley access. If property owners are not willing to give up access, the trail could be constructed as an on-street facility using Evans Avenue. No decision has been formalized at this time, and CDOT will revisit this trail concept during final engineering design through neighborhood-involved design charettes. Adding this segment of trail would connect minority and low-income neighborhoods to regional and local amenities throughout the corridor. Additionally, it would help to alleviate the historic impact of the original I-25 construction, which left the back of these homes in close proximity to the edge of highway pavement, by providing separation through a proposed noise wall and trail feature. This improvement is illustrated in **Chapter 2 – Alternatives, Exhibit 2-36**.
- ❖ **Access Revisions** – Exit ramps at Illinois Avenue and Minnequa Avenue would be disconnected to reduce the amount of cut-through traffic in adjacent neighborhoods. In these locations, the ramps that currently route exiting highway traffic onto local roads would be disconnected. This would reduce the number of trucks traveling through these neighborhoods en route to the steel mill. Similarly, Clark Street and D Street would be disconnected from Santa Fe Avenue and converted to cul-de-sacs to reduce cut-through traffic during events at the Runyon Field Sports Complex. This improvement is illustrated in **Chapter 2 – Alternatives, Exhibit 2-31** for the Existing I-25 Alternative and **Exhibit 2-34** for the Modified I-25 Alternative.

### 3.6.3.1 Summary

Because every neighborhood adjacent to I-25 throughout the affected area has minority and/or low-income populations, impacts from either Build Alternative would be predominantly borne by these populations. However, when off-setting benefits from the project and proposed mitigation are considered, these impacts would not be disproportionately high and adverse.

### 3.6.4 Mitigation

Unless otherwise specified, the following mitigations apply to both the Existing I-25 Alternative and the Modified I-25 Alternative (Preferred Alternative):

- ❖ All property acquisition and relocation will comply fully with federal and state requirements, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act), as described in **Section 3.4 Right-of-Way and Relocations**.
- ❖ To address the potential relocation of jobs along the project corridor, relocation areas for businesses serving the City and region will be identified. The *Pueblo Regional Development Plan* (Pueblo Area Council of Governments [PACOG], 2002); the *Central Pueblo Framework Plan* (PACOG, 2005); and the *Pueblo Expanded Urban Renewal Project* (Urban Renewal Authority of Pueblo, 2008) generally identify locations for employment-related land uses along the corridor. Efforts will be made to relocate displaced businesses within the City limits in order to maintain employment and tax revenues to the City.
- ❖ The mitigation plan for Mineral Palace Park is described in detail in **Section 3.3 Parks and Recreation** and **Chapter 4 – Section 4(f) Evaluation**.
- ❖ Mitigation measures to enhance the aesthetics of the project elements will be implemented as identified in the March 2010 Memorandum of Understanding between the City of Pueblo and CDOT (see **Appendix F**).
- ❖ Noise walls are proposed throughout the project corridor to reduce noise impacts to residences and recreational resources. Details are provided in **Section 3.5 Noise**.
- ❖ During construction, signage and detours will be set in place to direct traffic to businesses impacted by temporary or permanent access changes.
- ❖ CDOT will provide advance notice to emergency service providers, schools, the community, and residents regarding road delays, access, and special construction activities.
- ❖ CDOT will make a public information plan available throughout construction. This plan and any information on construction activities and detours will be provided in both English and Spanish.
- ❖ CDOT will provide permanent directional signage ahead of the 13th Street exit, 6th Street slip ramp, and Santa Fe Drive interchange to indicate to motorists how best to access the Santa Fe Avenue business district.
- ❖ For the Existing I-25 Alternative, CDOT will mitigate impacts to Benedict Park by expanding Benedict Park south of the existing park. The mitigation for Benedict

Park under the Existing I-25 Alternative is discussed in detail in **Section 3.3 Parks and Recreation** and **Chapter 4 – Section 4(f) Evaluation**.

- ❖ For the Modified I-25 Alternative (Preferred Alternative), CDOT will construct a new Benedict Park south of the existing park location between Mesa Avenue and Northern Avenue. The new park would be a minimum of 3.93 acres to a maximum of 4.30 acres in size (2.01 acres to 2.38 acres larger than the existing park). The range in size reflects ongoing efforts to refine the design to avoid impacts to residential parcels south of Mesa Avenue. The mitigation for Benedict Park under the Modified I-25 Alternative (Preferred Alternative) is discussed in detail in **Section 3.3 Parks and Recreation** and **Chapter 4 – Section 4(f) Evaluation**.

During final design, CDOT will consider the following opportunities to minimize impacts to Eiler Heights:

- Options for redesign of structural walls that support the northbound ramp between Northern Avenue and Mesa Avenue.
- A lower design speed for Mesa Avenue. This would require the City of Pueblo to grant a variance from City design standards.
- A Value Engineering study to identify ways to reduce impacts throughout the corridor.

CDOT will continue to involve the community in the design of the new Benedict Park, including discussions regarding the potential relocation of the steel mill stacks. For more information regarding the relocation of the steel mill stacks, see **Section 3.2 Historic Properties**.