

2.0 IDENTIFICATION OF THE PREFERRED ALTERNATIVE

2.1 DEVELOPMENT AND SCREENING OF ALTERNATIVES

CDOT and FHWA recognized that the decision for improvements to I-25 through Pueblo would require a multi-disciplinary approach to developing alternatives that would involve a team of transportation and highway design professionals/engineers, environmental managers, public involvement specialists, and a wide range of community stakeholders with an interest in the outcome of the project. To implement this approach, representatives from FHWA and CDOT joined a consultant team of professionals in a variety of disciplines to form the CDOT Project Team. The CDOT Project Team followed the guidelines of the National Cooperative Highway Research Program (NCHRP) *Report 480, A Guide to Best Practices for Achieving Context Sensitive Solutions*, for studying improvements to I-25 through Pueblo (NCHRP, 2002). Using the process outlined in the Context Sensitive Solutions guidelines resulted in a Community Vision (*Chapter 1 – Purpose and Need, Section 1.4 Vision Statement of the FEIS*) and transportation solutions that meet the Purpose and Need for the project, were sensitive to environmental and community resources, and reflected community values.

To ensure a comprehensive and rigorous evaluation of possible solutions, the CDOT Project Team used three levels of evaluation and screening: 1) Evaluation and Screening of Ideas, 2) Evaluation and Screening of Concepts, and 3) Evaluation and Screening of Strategies. The alternatives development and screening process, described in detail in *Chapter 2 – Alternatives* of the FEIS, resulted in the following final alternatives that represent the full range of all reasonable alternatives and were fully evaluated in the FEIS:

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

The Modified I-25 Alternative is the Preferred Alternative.

2.1.1 Final Detailed Alternatives

Descriptions of the final detailed alternatives are provided below.

No Action Alternative

The No Action Alternative consists of no capital improvements in the I-25 corridor study area but does include routine maintenance such as pavement overlays and restriping of the existing facility, as defined in PACOG's fiscally constrained *Pueblo Area 2035 Long Range Transportation Plan* (PACOG, 2008), and eventually the replacement of deficient structures. These routine maintenance projects have committed funding, as described in the *Pueblo Area 2035 Long Range Transportation Plan*, and will occur sometime over the next 20 years. As with the Build Alternatives, the No Action Alternative underwent a thorough analysis to measure how well it met the project Purpose and Need and evaluation criteria. Analysis of the No Action Alternative in the FEIS provided a benchmark, enabling decision-makers to compare the magnitude of the environmental effects of each of the Build Alternatives to the scenario of not making any improvements to I-25 through Pueblo. An overview of the roadway, interchange, network, bicycle, and pedestrian features of the No Action Alternative is provided and illustrated in **Exhibit 2-1**.

Existing I-25 Alternative

To meet projected capacity needs, the Existing I-25 Alternative would widen I-25 to six lanes (three in each direction) from just north of 29th Street to Indiana Avenue and maintain four lanes (two in each direction) from Indiana Avenue to Pueblo Boulevard on its current alignment. As shown in **Exhibit 2-2**, the Existing I-25 Alternative would reconstruct the interchanges at United States Highway (US) 50B, Indiana Avenue, and Pueblo Boulevard; provide access to 29th Street via a frontage road; and create a split-diamond interchange between 13th Street and 1st Street. The split-diamond configuration serving the downtown area would allow access to 1st Street, 4th Street, 8th Street, and 13th Street. Another split-diamond interchange between Abriendo

Avenue and Northern Avenue would consolidate access and straighten the existing highway curves; however, this reconfiguration requires the removal of highway access at Central Avenue and the closure of Currie Street.

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

The Existing I-25 Alternative would generally match the current I-25 elevation, except in a few areas where a change in the highway grade would be necessary to address safety problems. For example, through downtown, I-25 would be 25 to 40 feet higher than it is currently, which would eliminate the steep vertical curves in this area. There would also be a 20- to 30-foot rise in elevation at the Indiana Avenue interchange in order to develop a full interchange at Indiana Avenue and provide enough clearance for east-west traffic moving underneath I-25. The Existing I-25 Alternative would require the relocation of approximately 1.41 miles of UPRR tracks to the east between Abriendo Avenue and Minnequa Avenue to accommodate a wider highway footprint.

Ownership and maintenance of the new facilities included in the Existing I-25 Alternative are detailed in the Memorandum of Understanding (MOU) between CDOT and the City, which was finalized in March 2010 (see *Appendix F – Memorandum of Understanding Between the City of Pueblo and Colorado Department of Transportation* of the FEIS).

Modified I-25 Alternative (Preferred Alternative)

To meet projected capacity needs, the Modified I-25 Alternative (Preferred Alternative) would widen I-25 to six lanes (three in each direction) from just north of 29th Street to Indiana Avenue and maintain four lanes (two in each direction) from Indiana Avenue to Pueblo Boulevard. The Modified I-25 Alternative (Preferred Alternative), shown in **Exhibit 2-3**, was developed from the Existing I-25 Alternative by the CDOT Project Team and stakeholders and shares the design characteristics of the Existing I-25 Alternative, with the exception of one area of the corridor known as the Central Area, as described in the next paragraph.

In the Central Area of the corridor (between the Arkansas River and Canal Street), implementing the Existing I-25 Alternative would require moving the UPRR tracks 150 feet to the east to make room for widening I-25. Difficulties associated with moving the rail line led to the idea of relocating I-25 to a new alignment to the east at approximately Ilex Street. Moving I-25 to the new alignment in this area would allow the UPRR rail line south of the Arkansas River to remain in place. At approximately Minnequa Avenue, I-25 would bridge over the railroad tracks and run on the west side of the tracks, rejoining the existing I-25 alignment just south of Indiana Avenue.

The Modified I-25 Alternative (Preferred Alternative) was found to have unexpected benefits in the southern end of the corridor. By straightening I-25 at Ilex Street, I-25 would leave the existing alignment and continue south. The roadway no longer used as I-25 would be available to become an extension of Santa Fe Avenue, providing a local road that drivers could use to travel north-south through Pueblo without having to drive on I-25. This extension would not be possible under the Existing I-25 Alternative.

A second unexpected benefit of the Modified I-25 Alternative (Preferred Alternative) is that a new east-west direct connection would be made between Abriendo Avenue and Santa Fe Drive. This connection would provide improved access between the neighborhoods west and east of I-25. An overview of the roadway, interchange, network, bicycle, and pedestrian features of this Build Alternative is provided and illustrated in **Exhibit 2-3** and additional detailed figures can be found in **Appendix A** of this document.

The Modified I-25 Alternative (Preferred Alternative) would generally match the current I-25 elevation in areas where the alignment follows the current highway alignment, except in one key area where a change in the vertical grades is necessary to address safety problems. Through the downtown area, I-25 will be 25 to 40 feet higher than it is currently, which will eliminate the steep vertical curves in this area while providing enough clearance for east-west traffic moving underneath I-25.

EXHIBIT 2-1

No Action Alternative

I-25 Roadway Features

- 4 existing lanes, 2 in each direction
- Routine maintenance (pavement overlays, striping)

Interchange Features

- No improvements to interchanges

Network Features

- No improvements to network features

Bicycle and Pedestrian Features

- No bicycle or pedestrian improvements



EXHIBIT 2-2
Existing I-25 Alternative

I-25 Roadway Features

Six lanes (three in each direction) just north of 29th Street to Indiana Avenue

Standard shoulders and acceleration/ deceleration lanes

- 1 Straighten I-25 through downtown
- 2 Relocate Union Pacific Railroad

Interchange Features

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

Network Features

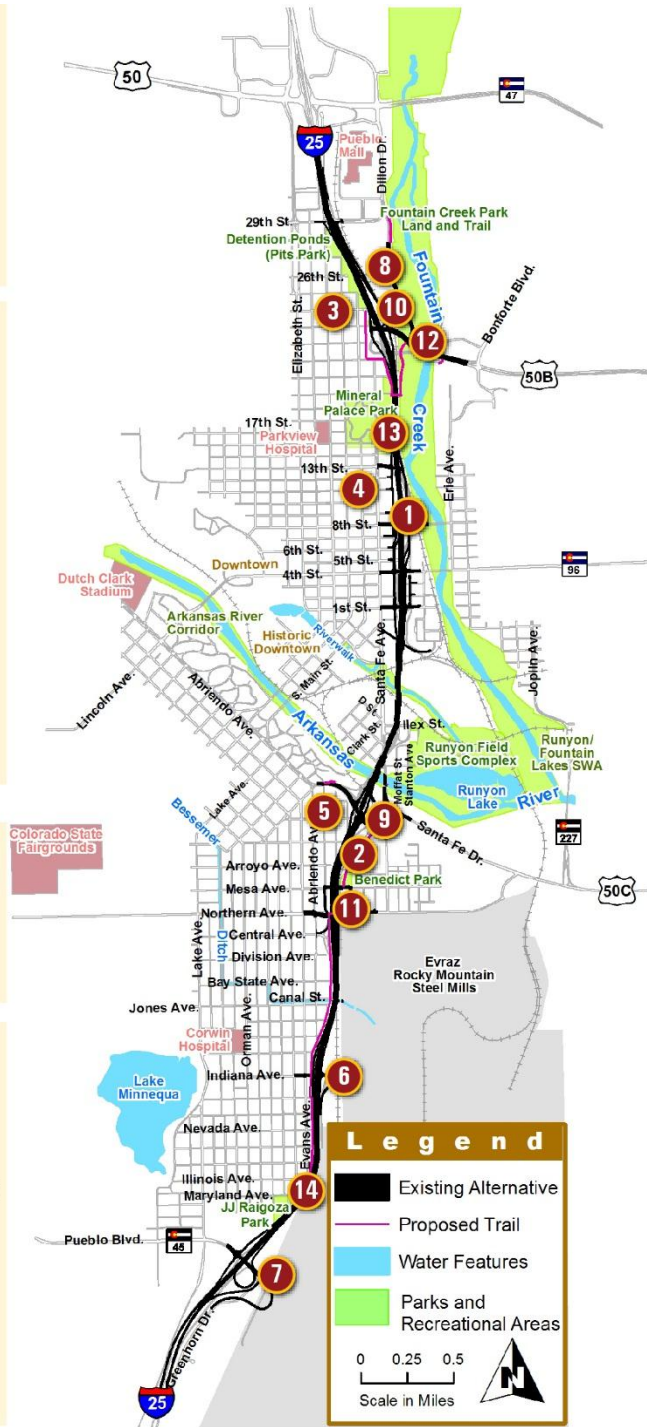
- 8 Extend Dillon Drive south from 26th Street to US 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US 50C)

Bicycle and Pedestrian Features

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

Other Features

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



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

EXHIBIT 2-3

Modified I-25 Alternative (Preferred Alternative)

I-25 Roadway Features

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

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

Interchange Features

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

Network Features

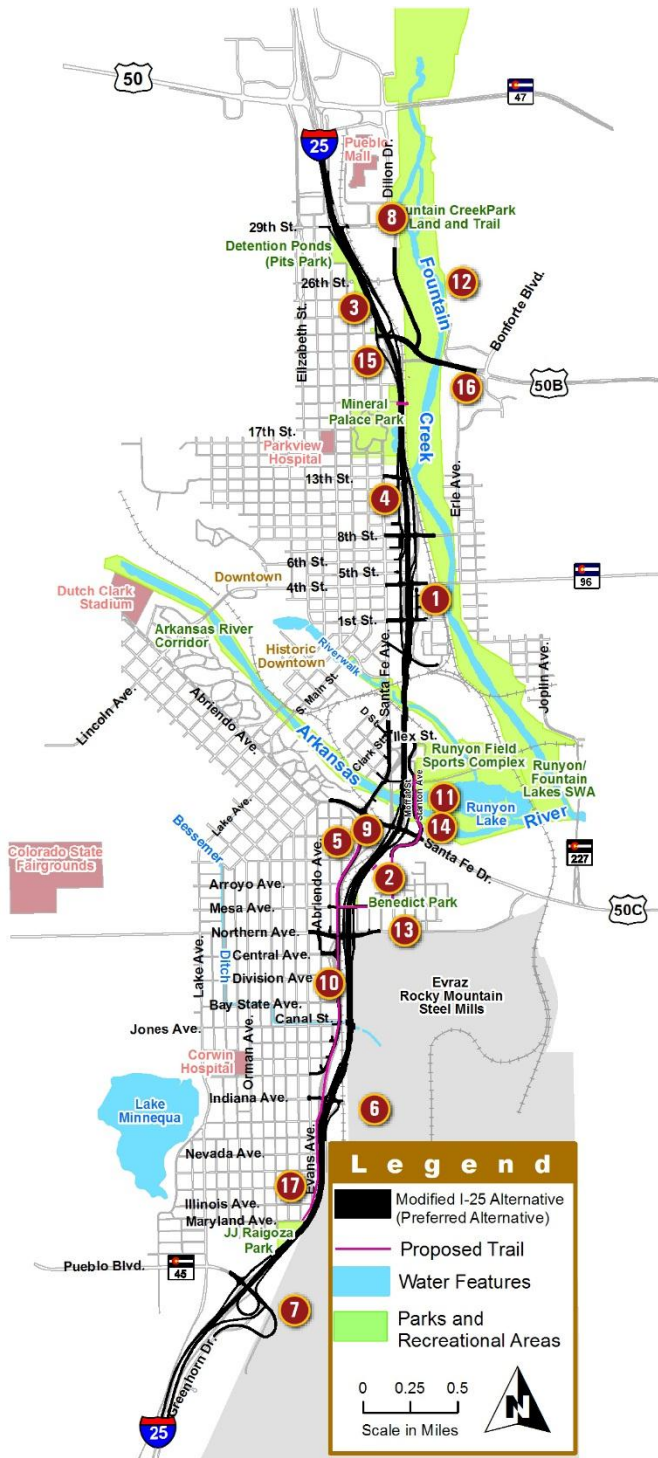
- 8 Extend Dillon Drive south from 26th Street to US 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US 50C)
- 10 Extend Santa Fe Avenue from Ilex Street to Minnequa Avenue
- 11 Rebuild Stanton Avenue south over the Arkansas River, intersect with Santa Fe Drive and connect to Santa Fe Avenue

Bicycle and Pedestrian Features

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

Other Features

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



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

Ownership and maintenance of the new facilities included in the Modified I-25 Alternative (Preferred Alternative) are detailed in the MOU between CDOT and the City, which was finalized in March 2010 (see *Appendix F – Memorandum of Understanding Between the City of Pueblo and Colorado Department of Transportation* of the FEIS).

Bicycle and Pedestrian Accommodations for both Build Alternatives

Both Build Alternatives would improve bicycle and pedestrian features by building sidewalks along the Dillon Drive extension and the US 50B Bridge. The Modified I-25 Alternative (Preferred Alternative) also adds sidewalks along Stanton Avenue, connecting the Historic Arkansas Riverwalk of Pueblo to Benedict Park. Other bicycle and pedestrian facility improvements for both Build Alternatives include expanded sidewalks on the Mesa Avenue overpass, new trails from Mineral Palace Park to the US 50B Bridge and between Runyon Field and JJ Raigoza Park, as well as a new pedestrian bridge between Mineral Palace Park and the Fountain Creek Trail.

The completion of proposed trails and sidewalks will provide continuous bicycle and pedestrian access between 29th Street in the north to Pueblo Boulevard in the south. Neighbors will be able to access trails near their homes that will provide families with safe, non-motorized access to Mineral Palace Park, Benedict Park, JJ Raigoza Park, Historic Arkansas Riverwalk of Pueblo, the Runyon Field Sports Complex, the Runyon/Fountain Lakes State Wildlife Area, and the Fountain Creek Park Land and Trail system.

2.2 BASIS FOR IDENTIFICATION OF THE PREFERRED ALTERNATIVE

After careful consideration of the goals and objectives identified in the Purpose and Need, as well as the potential impacts resulting from the alternatives and public and agency comments, FHWA and CDOT preliminarily identified the Modified I-25 Alternative as the Preferred Alternative for improvements to I-25 through Pueblo in the DEIS for public and agency review. After consideration of the public and agency comments on the DEIS, in addition to the factors noted above, FHWA and CDOT identified the Modified I-25 Alternative as the Preferred Alternative in the FEIS. The following discussion characterizes the ability of all the alternatives to meet the Purpose and Need and other contributing factors supporting the identification of the Preferred Alternative.

2.2.1 How the Preferred Alternative Addresses the Elements of the Purpose and Need

Both Build Alternatives address the safety and capacity elements of the Purpose and Need. In addition, the Preferred Alternative best meets the local and regional mobility elements as described below.

- ❖ Both Build Alternatives would restore some connectivity to neighborhoods that were previously divided by the original construction of I-25. However, the Preferred Alternative provides additional connectivity to the north and south with the extension of Stanton Avenue north and west to Santa Fe Avenue and south to Santa Fe Drive. Residents of the Bessemer Neighborhood east of I-25 would be more connected to the rest of the neighborhood, as well as the community resources in the Grove Neighborhood and Downtown Neighborhood. This opportunity is not available under the No Action Alternative or the Existing I-25 Alternative.
- ❖ The Preferred Alternative improves north-south local and regional mobility by converting the existing I-25 south of the Arkansas River to an extension of Santa Fe Drive to facilitate local trips more efficiently and maintain regional trips on I-25. This opportunity is not available under the No Action Alternative or the Existing I-25 Alternative.
- ❖ The Preferred Alternative improves east-west local mobility over the Existing I-25 Alternative by providing a more direct connection to I-25 at Abriendo Avenue. Under the Existing I-25 Alternative, drivers on Abriendo Avenue would have to turn at a signalized intersection at Santa Fe Drive to remain on Abriendo Avenue. For the Preferred Alternative, Abriendo Avenue is a direct connection that does not require a turn at a signal.
- ❖ The extension of Santa Fe Avenue under the Preferred Alternative provides a benefit to residences on the south end between Minnequa Avenue and Logan Avenue by returning the functionality of their properties. When I-25 was originally constructed, homes that had access to Schley Avenue lost that access, and their front doors were adjacent to the new highway. As a result, access to these homes was provided only through the back alley. With the extension of Santa Fe Avenue, access to the front of these homes would be restored.

2.2.2 Other Contributing Factors

In addition to the Purpose and Need, other factors were considered in the identification of the Preferred Alternative, including the cost effectiveness of each Build Alternative; the recommendation of local officials; a comparison of potential impacts to the environment under each Build Alternative; and consistency with other regulatory requirements, in particular Section 4(f) of the United States Department of Transportation Act of 1966 and Section 404 of the Clean Water Act, both of which have specific requirements that must be met by the Preferred Alternative. Each of these elements is summarized below.

Difference in Cost Between the Alternatives

The construction cost of each Build Alternative was considered; however, the costs between the two Build Alternatives were too similar to be a differentiating factor. The Existing I-25 Alternative would cost approximately \$710.1 million to construct, and the Preferred Alternative would cost approximately \$760.5 million to construct.

Public and Agency Support for the Preferred Alternative

The City of Pueblo Parks and Recreation Department expressed support for the Preferred Alternative in a letter dated July 13, 2010. Preference for the Preferred Alternative was based on improved trail connections and facilitation of north-south movement in the corridor. City officials have influenced the design of the Preferred Alternative and have assisted with the identification of appropriate mitigation measures. Support for the Preferred Alternative has also been provided by the Project Leadership Team. (For information on the membership, roles and responsibilities, and contributions of this team, refer to *Chapter 6 – Comments and Coordination* of the FEIS). In 2013, the City Council of Pueblo, PACOG, and Pueblo County Commissioners each expressed support and preference for the Modified I-25 Alternative as the Preferred Alternative in formal resolutions, which can be found in *Appendix B – Agency Consultation and Coordination* of the FEIS.

The CDOT Project Team used an extensive public involvement approach during the development of each alternative, as discussed in *Chapter 6 – Comments and Coordination* of the FEIS. Throughout the development of the Build Alternatives, the public consistently expressed preference for the Preferred Alternative. During the formal comment period for the DEIS, residents of the Bessemer Neighborhood east of I-25 and south of Mesa Avenue expressed concern about impacts to their community as a result of the Preferred Alternative, in particular, the number of property acquisitions that would be required south of Mesa Avenue. CDOT and the City met with representatives from the community in the beginning of 2012 to discuss these concerns and identify additional mitigation measures, which are documented in *Chapter 3 – Affected Environment and Environmental Consequences, Section 3.6 Social Resources, Economic Conditions, and Environmental Justice* in the FEIS.

Difference in Environmental Impacts Between the Alternatives

New Pueblo Freeway project impacts were evaluated and organized by three geographic areas within the project area: North, Central, and South. The North Area extends from just north of 29th Street to Ilex Street. The Central Area continues from Ilex Street to Nevada Avenue. The South Area extends between Nevada Avenue and milepost 94, just south of the Pueblo Boulevard interchange. Both Build Alternatives share the same impacts in the North Area and South Area of the project. The only difference in impacts occurs in the Central Area of the project between Ilex Street and the Evraz Rocky Mountain Steel Mills. **Exhibit 2-4** summarizes the direct and indirect impacts that would result from the No Action Alternative, Existing I-25 Alternative, and the Preferred Alternative.

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
TRANSPORTATION		
<ul style="list-style-type: none"> ❖ Interchanges would continue to connect to discontinuous local and neighborhood streets, providing limited east-west local mobility across I-25. ❖ Conflicts between local and regional users of the highway would persist. ❖ Traffic congestion would continue to increase, resulting in LOS F conditions, further reducing regional mobility on I-25. ❖ Aging and functionally obsolete bridges meeting current sufficiency standards would continue to deteriorate. 	<ul style="list-style-type: none"> ❖ The Build Alternatives would positively impact transportation safety and local/regional mobility in Pueblo. The geometric and operational deficiencies that are a result of the age of I-25 would be corrected, thereby improving safety. Local and regional mobility would be improved through the connection of interchanges to appropriate City streets, the creation of off-highway connections, a consistent speed limit along I-25, increased capacity, provisions or multi-modal elements such as trails and sidewalks, and the replacement of functionally obsolete bridges along the corridor. ❖ Temporary impacts to traffic to businesses and residents such as changes in access, delay caused by lane closures, out-of-direction travel incurred due to detours, and other similar unavoidable impacts caused by construction-related activities. 	<ul style="list-style-type: none"> ❖ Restores off-highway connections that were removed during original I-25 construction. Provides alternative north-south routes for local users on Santa Fe Avenue and Dillon Drive. Reduces demand on I-25 and increases local mobility and east-west access by reconstructing the Northern Avenue interchange and construction of a frontage road system. Extension of Santa Fe Avenue and Stanton Avenue to reestablish 23 miles of local grid system and improve safety and local mobility. ❖ Modifies Transit Route 6 by reconfiguring the downtown interchange system and Transit Route 11 by reconfiguring Santa Fe Avenue and Stanton Avenue.
HISTORIC PROPERTIES		
<ul style="list-style-type: none"> ❖ No known impacts to historic properties. 	<ul style="list-style-type: none"> ❖ Adverse effects to 33 historic properties, including adverse effects to the North Side, Second Ward, and Steelworks Suburbs historic districts. 	<ul style="list-style-type: none"> ❖ Adverse effects to 40 historic properties, including adverse effects to the North Side, Second Ward, Steelworks Suburbs, and Grove historic districts and two archaeological sites.
PARKS AND RECREATION		
<ul style="list-style-type: none"> ❖ Existing noise and visual effects to park facilities due to the proximity of roads to the parks would continue. ❖ Continued sedimentation and pollutant loading from stormwater runoff into surface waters, riparian areas, and wetlands adjacent to the highway could adversely affect wildlife habitat in Fountain Creek Park Land. ❖ Access to the Runyon Field Sports Complex would remain difficult. Before and after events, queues would continue to extend onto I-25. 	<ul style="list-style-type: none"> ❖ Direct impact to 1.69 acres (3 percent of the 50.07 acre park) of Mineral Palace Park including removal of the northeast park road to a parking lot, 40 parking spaces, 20 mature trees, 15 to 20 percent of Lake Clara, 40 feet of the WPA wall around Lake Clara, and 13 percent of the maintenance yard. An informal path within the park would also be impacted. ❖ Direct impact to 7.68 acres (2 percent of the 400 acre park) of Fountain Creek Park Land property. ❖ Without mitigation measures, noise would exceed the Noise Abatement Criteria at Fountain Creek Park Land, Mineral Palace Park, JJ Raigoza Park, and the detention ponds between 29th Street and 24th Street. ❖ Stormwater detention features included in the Build Alternatives will capture stormwater runoff and reduce impacts on wetlands, riparian areas, and wildlife within the Fountain Creek Park Land. ❖ Temporary detours and/or closures of the Fountain Creek Trail, Arkansas River Trail, and Thomas Phelps Creek Trail would be required to protect the public when construction is occurring above the trail. ❖ Both Build Alternatives would benefit recreation by constructing new trails and sidewalk connections from Mineral Palace Park to the US 50B Bridge and between Runyon Field and JJ Raigoza Park, as well as a new pedestrian bridge between Mineral Palace Park and the Fountain Creek Trail. 	

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
	<ul style="list-style-type: none"> ❖ Direct impact to 0.42 acre of Benedict Park, including the elimination of the informal athletic field. 	<ul style="list-style-type: none"> ❖ Direct impact to Benedict Park, resulting in the acquisition of the entire park (1.92 acres) and its facilities. ❖ Direct impacts of up to 2.81 acres of the Runyon/Fountain Lakes State Wildlife Area. Includes the removal of the existing pedestrian bridge over the Arkansas River. The trail leading to the existing pedestrian bridge would also need to be relocated to a new river crossing location. The park benches would also need to be moved to the east. ❖ Extension of Stanton Avenue would benefit Runyon Field Sports Complex by providing access to the park from the local road network instead of I-25 and minimizing traffic queues on I-25.
	<ul style="list-style-type: none"> ❖ Requires the conversion of 6.68 acres of Section 6(f) property¹, including 6.26 acres from Fountain Creek Park Land³ and 0.42 acres from Benedict Park. 	<ul style="list-style-type: none"> ❖ Requires the conversion of between 8.18 acres and 10.99 acres of Section 6(f) property^{1,3} including 6.68 acres from Fountain Creek Park Land², 1.92 acres from Benedict Park, and between 0 and 2.81 acres from Runyon/Fountain Lakes State Wildlife Area.
RIGHT-OF-WAY		
<ul style="list-style-type: none"> ❖ Would not require acquisition of property or any relocations. 	<ul style="list-style-type: none"> ❖ Construction would require a total of 273 acquisitions (219 total acquisitions and 54 partial acquisitions) and 154 acres (74 total acquisitions and 80 partial acquisitions). ❖ Residential property impacts include 87 total acquisitions (9 acres) and 2 partial acquisitions (<1 acre). ❖ Commercial property impacts include 53 total acquisitions (32 acres) and 25 partial acquisitions (36 acres). A total of 59 businesses would be displaced. ❖ Vacant undeveloped property impacts include 66 total acquisitions (27 acres) and 14 partial acquisitions (37 acres). ❖ Public property impacts include 13 total acquisitions (6 acres) and 13 partial acquisitions (6 acres). 	<ul style="list-style-type: none"> ❖ Construction would require a total of 309 acquisitions (246 total acquisitions and 63 partial acquisitions) and 178 acres (84 total acquisitions and 94 partial acquisitions). ❖ Residential property impacts include 117 total acquisitions (14 acres) and 0 partial acquisitions. ❖ Commercial property impacts include 56 total acquisitions (34 acres) and 26 partial acquisitions (46 acres). A total of 65 businesses would be displaced. ❖ Vacant undeveloped property impacts include 58 total acquisitions (27 acres) and 22 partial acquisitions (42 acres). ❖ Public property impacts include 15 total acquisitions (9 acres) and 15 partial acquisitions (6 acres)

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
NOISE		
<ul style="list-style-type: none"> ❖ Noise levels from I-25 would change between existing conditions and conditions for the No Action Alternative in the design year (2025), due to changes in traffic volume and speed. ❖ 7 of 40 representative receptors would meet or exceed CDOT's noise abatement criteria. 	<ul style="list-style-type: none"> ❖ Construction would create temporary noise impacts. <ul style="list-style-type: none"> ❖ 18 receptors would meet or exceed CDOT's noise abatement criteria. ❖ Noise levels are predicted to increase up to 12 dBA. ❖ One receptor would experience a substantial noise increase (as defined by CDOT's 10 dBA criterion). 	<ul style="list-style-type: none"> ❖ 12 receptors would meet or exceed CDOT's noise abatement criteria. ❖ Noise levels are predicted to increase up to 8 dBA.
SOCIAL RESOURCES, ECONOMIC CONDITIONS, AND ENVIRONMENTAL JUSTICE		
<ul style="list-style-type: none"> ❖ I-25 would continue to be a community barrier. Noise levels would increase as a result of changes in traffic volumes and speeds on I-25. 	<ul style="list-style-type: none"> ❖ Both Build Alternatives require the acquisition of businesses, resulting in the relocation of up to 600 jobs (1 percent of the total employment in Pueblo County). ❖ The implementation of either Build Alternative would generate direct and indirect employment opportunities throughout construction. ❖ Community cohesion in the Northside, Eastside, Downtown, and Bessemer neighborhoods would be positively impacted by improved local roadway and trail systems. The Modified I-25 Alternative (Preferred Alternative) provides additional connectivity to the north and south with the extension of Stanton Avenue to the north and west to Santa Fe Avenue and south to Santa Fe Drive. ❖ Impacts from either Build Alternative would be predominantly borne by minority and low-income populations. When off-setting benefits from the project and proposed mitigation are also considered, these impacts would not be considered disproportionately high and adverse. ❖ Detours and traffic delays would inconvenience residents, businesses and community facilities during construction. 	<ul style="list-style-type: none"> ❖ 65 businesses would be relocated. ❖ Requires acquisition of 117 residences, 67 from the west side of the Bessemer Neighborhood, 34 from the Grove Neighborhood, and 16 from within the Goat Hill Area (approximately 15 percent of the housing stock in the area).
	<ul style="list-style-type: none"> ❖ 59 businesses would be relocated. ❖ Requires acquisition of 87 residences, 71 from the west side of the Bessemer Neighborhood and 16 from within the Goat Hill Area (approximately 15 percent of the housing stock in the area). 	
WETLANDS		
<ul style="list-style-type: none"> ❖ No wetlands or waters of the United States would be directly impacted. Wetlands in the project area currently affected by the influx of pollutants contained in highway runoff would continue to degrade over time. 	<ul style="list-style-type: none"> ❖ Direct loss of 0.22 acre of wetlands. ❖ BMPs will reduce the amount of pollutants entering wetlands. 	<ul style="list-style-type: none"> ❖ Direct loss of 1.1 acres of wetlands. ❖ BMPs will reduce the amount of pollutants entering wetlands.

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
LAND USE		
<ul style="list-style-type: none"> ❖ Consistent with the <i>Pueblo Roadway Corridor Right-of-Way Preservation Plan</i> (PACOG, 2000) as well as existing and future land uses. Inconsistent with the <i>Pueblo Regional Development Plan</i> (PACOG, 2002). Does not support the <i>Central Pueblo Framework Plan</i> (PACOG, 2005). 	<ul style="list-style-type: none"> ❖ Both Alternatives would require land acquisition and convert land to transportation uses as detailed under the Right-of-Way section of this exhibit. ❖ Given the developed nature of the corridor, the New Pueblo Freeway project would not be expected to induce growth or result in substantial changes to existing land use patterns. ❖ New Pueblo Freeway project improvements are consistent with the <i>Pueblo Comprehensive Plan</i> (PACOG, 2002), <i>Pueblo Roadway Corridor Right-of-Way Preservation Plan</i> (PACOG, 2000) and the <i>Central Pueblo Framework Plan</i> (PACOG, 2005). 	
	<ul style="list-style-type: none"> ❖ Consistent with existing and future land uses. 	<ul style="list-style-type: none"> ❖ While improvements are not consistent with current land uses in the Central Area (residential land uses would be removed near the Runyon Field Sports Complex), they are consistent with future land use plans, which identify the area as a special development area.
VISUAL RESOURCES		
<ul style="list-style-type: none"> ❖ I-25 would become increasingly congested. The resulting traffic would become more visually apparent in all viewsheds and to homes, businesses, parks, and public facilities that currently back up to the highway. ❖ Continues to have an assortment of bridge types, fixtures with varied types of light sources, and other highway elements such as retaining walls, railings, and noise walls. 	<ul style="list-style-type: none"> ❖ Increased mass of the highway, noise barriers and water quality ponds would increase the highway's visual presence in existing neighborhoods along I-25. Both Build Alternatives alter the Fountain Creek, Downtown, and Steel Mill viewsheds by introducing new roadway modifications. ❖ Removes the historic smoke stacks and stoves from the Evraz Rocky Mountain Steel Mills site. 	
	<ul style="list-style-type: none"> ❖ Removes the high line track from the Evraz Rocky Mountain Steel Mills site. 	
AIR QUALITY		
<ul style="list-style-type: none"> ❖ No NAAQS violations expected. ❖ MSAT emissions levels are expected to decline as a result of EPA's national control programs. 	<ul style="list-style-type: none"> ❖ Neither Build Alternative would cause or contribute to an exceedance of the NAAQS. ❖ An increase in VMT for the Build Alternatives would result in higher MSAT emissions compared to the No-Action Alternative. This increase would be offset somewhat by increased speeds. Some localized increases and decreases in emissions are anticipated due to changes in travel patterns. MSAT emission levels are expected to decline overall as a result of EPA's national control programs. ❖ Construction impacts from excavation, grading, and fill work could temporarily increase local fugitive dust and exhaust emissions. 	
HAZARDOUS MATERIALS		
<ul style="list-style-type: none"> ❖ No changes to current conditions. 	<ul style="list-style-type: none"> ❖ Impacts 12 sites with RECs and areas of potential concern. ❖ Impacted sites are common to both Build Alternatives, with the exception of the Colorado Smelter and Santa Fe (Bridge) Culvert Sites, which would be impacted only by the Existing I-25 Alternative. 	<ul style="list-style-type: none"> ❖ Impacts 13 sites with RECs and areas of potential concern. ❖ Impacted sites are common to both Build Alternatives, with the exception of the VAE Nortrack and the Pueblo MOP Yard sites would be impacted only by the Modified I-25 Alternative (Preferred Alternative).

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
FISH AND WILDLIFE HABITAT		
❖ No changes to current conditions.	<ul style="list-style-type: none"> ❖ Loss of low-quality nesting habitat for migratory birds. ❖ Both Build Alternatives result in noise from construction activities that could affect wildlife species, and could temporarily displace migratory bird and raptor species. Construction activities could also affect wildlife by removing vegetation and wildlife habitats. 	
	<ul style="list-style-type: none"> ❖ Direct loss of 8.95 acres of wildlife habitat. Extension of Abriendo Avenue would divide wetlands and wooded upland habitat near Santa Fe Avenue. ❖ Construction of new bridge piers over the Arkansas River would impact 0.01 acre of open water. 	<ul style="list-style-type: none"> ❖ Direct loss of 18.10 acres of wildlife habitat. Shifting I-25 to the east would result in fragmentation of riparian habitat along the Arkansas River and removal of 60 percent of the wooded upland habitat and almost all of the wetland near Santa Fe Avenue. ❖ Construction of new bridge piers over the Arkansas River would impact 0.08 acre of open water.
SENSITIVE SPECIES		
❖ No changes to current conditions.	<ul style="list-style-type: none"> ❖ Impacts to 5.21 acres of plains leopard frog habitat. 	<ul style="list-style-type: none"> ❖ Impacts to 8.62 acres of plains leopard frog habitat.
	<ul style="list-style-type: none"> ❖ Impacts to 0.14 acre of Arkansas darter habitat. 	<ul style="list-style-type: none"> ❖ Impacts to 0.15 acre of Arkansas darter habitat.
FLOODPLAINS		
❖ No changes to current conditions.	<ul style="list-style-type: none"> ❖ Impacts to 3.35 acres of the Fountain Creek Floodplain near the US 50B Bridge during a 100-year flood event, in an area not currently within the 100-year floodplain boundaries. The new bridge would have a greater conveyance capacity, resulting in a decrease in BFE near the bridge. The Dillon Drive extension results in two longitudinal encroachments of the floodplain. Increases the BFE and floodplain width upstream of the new Dillon Drive embankment; increases channel velocity below the embankment. 	
	<ul style="list-style-type: none"> ❖ Impacts to the Arkansas River Floodplain for the Existing I-25 Alternative would be limited to replacement of the existing I-25 bridge in its approximate current location. In the area where the new piers would be placed, model results showed a slight (0.1 foot) decrease in BFE, reduction in floodplain width (3 feet), and an increase in velocity (between 0.3 and 0.4 feet per second), which would be an improvement to the existing floodplain. 	<ul style="list-style-type: none"> ❖ Impacts to the Arkansas River Floodplain for the Modified I-25 Alternative (Preferred Alternative) would be located east of the existing bridge and would result in a new transverse encroachment on the floodplain and floodway. ❖ The width of the Arkansas River Floodplain would increase by 2 feet north of the Arkansas Bridge location, however the floodplain width decreases by approximately 129 feet downstream, where the velocities are predicted to increase by 0.1 feet per second. ❖ Implementation of the Modified I-25 Alternative (Preferred Alternative) would not flood any new areas that were not within the existing 100-year Arkansas River Floodplain.

EXHIBIT 2-4

Comparison of Direct and Indirect Impacts from the Alternatives Considered in the FEIS

No-Action Alternative	Existing I-25 Alternative	Preferred Alternative
WATER QUALITY		
<ul style="list-style-type: none"> ❖ Water Quality would continue to degrade due to the projected increase in highway traffic volumes and lack of structural water quality facilities within the project area. 	<ul style="list-style-type: none"> ❖ Construction activities will result in erosion and sediment control issues during earthwork and other construction activities resulting in bare surfaces. Erosion and sediment control issues will be managed through the development and implementation of a site-specific SWMP. ❖ Permanent stormwater BMPs, such as detention ponds and grass swales, will reduce the amount of pollutants entering area receiving waters. ❖ Increases impervious surface by 73 acres. ❖ Without mitigation, pollutants found in highway runoff would be expected to increase over existing levels by approximately 77 percent. 	<ul style="list-style-type: none"> ❖ Increases impervious surface by 70 acres. ❖ Without mitigation, pollutants found in highway runoff would be expected to increase over existing levels by approximately 74 percent.
UTILITIES		
<ul style="list-style-type: none"> ❖ No changes to current conditions. 	<ul style="list-style-type: none"> ❖ Impacts above and below ground utility lines. Crosses over storm sewers. Encroaches on alternate coolant water line at the Evraz Rocky Mountain Steel Mills. ❖ Relocates Xcel Energy's south town natural gas transfer station. ❖ Requires widening of the existing box culvert over Bessemer Ditch. 	<ul style="list-style-type: none"> ❖ Requires a new crossing for I-25 over the Bessemer Ditch.
ENERGY		
<ul style="list-style-type: none"> ❖ Energy will continue to be expended for automobile, truck, and bus transportation. ❖ Energy will continue to be expended for maintenance. 	<ul style="list-style-type: none"> ❖ On a daily basis, the difference in energy use between the Build Alternatives and the No Action Alternative is negligible. ❖ Construction of the 80.38 total lane miles requires 1,899,000 million Btu(s). 	<ul style="list-style-type: none"> ❖ Construction of the 90.18 total lane miles requires 2,194,000 million Btu(s).
NOXIOUS WEEDS		
<ul style="list-style-type: none"> ❖ Noxious weeds currently present in the project area would continue to grow and spread, although they would be managed through standard CDOT maintenance operations within CDOT ROW. 	<ul style="list-style-type: none"> ❖ Ground disturbance and other construction activities in the project area may expand areas already infested with noxious weeds, may spread weeds to adjacent land as well as to wetland and riparian habitats nearby, and may introduce new weed species to the project area. Construction activities in the project area will result in vegetation removal and ground disturbance, which may potentially provide opportunities for noxious weed eradication or control if properly managed and reseeded. 	
PALEONTOLOGICAL RESOURCES		
<ul style="list-style-type: none"> ❖ No changes to current conditions. 	<ul style="list-style-type: none"> ❖ Neither of the Build Alternatives would impact any known paleontological resources. 	
SOILS AND GEOLOGY		
<ul style="list-style-type: none"> ❖ The No Action Alternative would not disturb any geologic hazards or soils. 	<ul style="list-style-type: none"> ❖ Because both Build Alternatives generally follow the current I-25 alignment, which was built on fill, it is unlikely that the Build Alternatives would encounter unstable soils or geological hazards during construction. 	
SECTION 4(f) RESOURCES		
<ul style="list-style-type: none"> ❖ No changes to current conditions. 	<ul style="list-style-type: none"> ❖ Results in the use of 35 Section 4(f) properties, including 3 historic districts (84 contributing properties), 28 individual properties, and 4 park and recreational resources. 	<ul style="list-style-type: none"> ❖ Results in the use of 39 Section 4(f) properties, including 4 historic districts (78 contributing properties), 30 individual historic properties, and 5 park and recreational resources.⁴

¹ Section 6(f)(3) assisted properties include parks and recreational facilities that have been acquired through the use of grants from the LWCF Act. Section 6(f) of the LWCF Act ensures that federal investments in the LWCF are maintained for public outdoor recreational use. The LWCF Act requires that, prior to conversion of Section 6(f)(3) assisted property, the agency proposing the conversion must evaluate all practical alternatives to the conversion and identify adequate replacement property.

² Of the 7.68 acres of impact to Fountain Creek Park Land, 6.26 acres constitute a Section 6(f) conversion. The 1.42 acres of land associated with the stormwater detention features in this area would not be considered a conversion of Section 6(f) property because the ponds would remain open for recreation and would still function as open space.

³ The variation in impacts for the Preferred Alternative is due to discrepancies in the mapping of the Section 6(f) boundary for Runyon/Fountain Lakes State Wildlife Area. If it is determined that none of the improvements are located within the boundary, there would be no Section 6(f) use of this property and the Build Alternatives would only differ in the Section 6(f) use of Benedict Park. This issue will be resolved in further consultation with the Colorado Parks and Wildlife as the project is developed and funded.

⁴ The FEIS identified the Preferred Alternative as the alternative that results in the least overall harm to Section 4(f) properties based on the ability to mitigate adverse impacts, the relative severity of the remaining harm after mitigation, the views of the officials with jurisdiction, and the degree to which the alternative meets the Purpose and Need for the project.

ACM = asbestos containing material

BFE = base flood elevation

BMP = Best Management Practice

Btu = British thermal unit

CDOT = Colorado Department of Transportation

CPW = Colorado Parks and Wildlife

dBA = A-weighted decibel

EPA = United States Environmental Protection Agency

I-25 = Interstate 25

LWCF = Land and Water Conservation Fund

LWCF Act = Land and Water Conservation

MSAT = Mobile Source Air Toxics

NAAQS = National Ambient Air Quality Standards

PACOG = Pueblo Area Council of Governments

REC = Recognized Environmental Condition

ROW = right-of-way

SWMP = Stormwater Management Plan

VMT = vehicle miles traveled

The primary differences in impacts between the Build Alternatives are as follows:

- ❖ Each of the Build Alternatives would positively impact local and regional mobility, however the Preferred Alternative provides additional north-south connectivity with the extension of Stanton Avenue, Santa Fe Avenue, and Santa Fe Drive. Additional east-west mobility improvements are provided by a more direct connection to I-25 at Abriendo Avenue in the Preferred Alternative.
- ❖ Wetlands impacts would differ by less than 1 acre, with the Preferred Alternative impacting 0.88 acre more wetlands area than the Existing I-25 Alternative.
- ❖ Impacts to non-wetland waters of the United States (as defined by the United States Army Corps of Engineers [USACE]) are nearly equal for the two alternatives. Under the Existing I-25 Alternative, the single bridge piers currently in place at the Arkansas River crossing would be removed and replaced; however, they would be placed in the same locations as the existing piers and designed to occupy a slightly smaller footprint. For the Preferred Alternative, 18 new bridge piers would be placed in the Arkansas River to support the bridges for I-25, two ramps, and the extension of Stanton Avenue, resulting in 0.02 acre of impacts to the Arkansas River.
- ❖ Although the Preferred Alternative would impact seven additional historic properties compared to the Existing I-25 Alternative, the Preferred Alternative would have fewer impacts to properties within the Steelworks Suburbs Historic District, with 56 being fully or partially acquired compared to 68 properties under the Existing I-25 Alternative.
- ❖ Both Build Alternatives would impact Benedict Park. While the initial impact would be greater under the Preferred Alternative, the Preferred Alternative allows for the construction of a new park that would be a minimum 3.93 acres to a maximum 4.30 acres in size to replace the existing Benedict Park, resulting in a larger contiguous park. The Existing I-25 Alternative would reduce the size of the existing park to 1.50 acres and create a new 2.55-acre park across the roadway from the existing Benedict Park.
- ❖ Impacts to Runyon/Fountain Lakes State Wildlife Area are greater under the Preferred Alternative. The Existing I-25 Alternative results in temporary impacts to the Thomas Phelps Creek Trail, which is one the recreational elements associated with the property. The Preferred Alternative impacts the Runyon/Fountain Lakes State Wildlife Area primarily through property acquisition (which is needed for bridge piers and fill material to support bridge slopes), trail relocation (which requires the relocation of a pedestrian bridge and park benches), and temporary trail detours during construction. However, after mitigation and project completion, there would be no permanent loss of recreational function within the park or loss of land utilized for active recreation within the park.

- ❖ There are a total of 309 right-of-way (ROW) acquisitions identified for the Preferred Alternative (246 total and 63 partial). The Existing I-25 Alternative requires 273 ROW acquisitions (219 total and 54 partial).
- ❖ Noise levels will exceed CDOT's noise abatement criteria in several locations with each Build Alternative. The noise levels are expected to impact more receptor locations, at a higher A-weighted decibel (dBA) level, in the Existing I-25 Alternative.
- ❖ Either Build Alternative would result in the conversion of Section 6(f) property. The Existing I-25 Alternative would require the conversion of 6.68 acres of 6(f) property. This is compared to between 8.81 acres and 10.99 acres under the Preferred Alternative. The variation in impacts for the Preferred Alternative is due to discrepancies in the mapping of the Section 6(f) boundary for Runyon/Fountain Lakes State Wildlife Area. If it is determined that none of the improvements are located within the boundary, there would be no Section 6(f) use of this property and the Build Alternatives would only differ in the Section 6(f) use of Benedict Park. This issue will be resolved in further consultation with the Colorado Parks and Wildlife (CPW) as the project is developed and funded.
- ❖ There is very little difference between the Existing I-25 Alternative and Preferred Alternative in terms of impacts to other resources. Both Build Alternatives would impact minimal amounts of wildlife habitat, including Arkansas darter and plains leopard frog habitat.
- ❖ The Preferred Alternative would impact one additional hazardous material site than the Existing I-25 Alternative, but it would also require less impervious surface area (3 acres less than the Existing I-25 Alternative), which would result in lower water pollutant levels than the Existing I-25 Alternative.

In addition to the environmental impacts noted above, consideration was given to how each of the alternatives complied with Section 4(f) of the United States Department of Transportation Act of 1966 and Section 404 of the Clean Water Act.

- ❖ **Section 4(f) of the United States Department of Transportation Act of 1966.** Section 4(f) stipulates that FHWA and other Department of Transportation agencies cannot approve the use of land from publicly owned parks or recreational areas, wildlife or waterfowl refuges, or public or private historical sites unless the following conditions apply:
 - A determination is made that there is no feasible and prudent alternative to the use of land from the property, and the action includes all possible planning to minimize harm to the property resulting from such use; or
 - The use of property, including any measures to minimize harm, will have a *de minimis* impact on the property.

Section 4(f) legislation requires the selection of an alternative that avoids the use of Section 4(f) property if that alternative is deemed feasible and prudent. The Section 4(f) regulation states that, if there is no feasible and prudent alternative that avoids use of Section 4(f) properties, FHWA "may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose" (23 CFR 774).

Based on the Section 4(f) Evaluation, discussed in **Section 4 – Section 4(f)** of this document, the Preferred Alternative, with the proposed mitigation, has been determined to cause the least overall harm to Section 4(f) properties. Of the 39 properties for which a transportation use has been identified, the Existing I-25 Alternative would result in greater harm to five properties while the Preferred Alternative would result in greater harm to four properties. For all other properties, the relative harm is considered equal. The key differences are summarized below and detailed in *Chapter 4 – Chapter 4(f) Evaluation, Section 4.6 Least Overall Harm Analysis* of the FEIS.

Mitigation for impacts to Benedict Park included in the Preferred Alternative would provide a larger contiguous park (3.93 acres to 4.30 acres in size, compared to the 1.92-acre existing park), more amenities, and improved access, resulting in a net benefit to the park and its users. This park plan is made possible through property acquisition and is only feasible under the Preferred Alternative, which requires a full acquisition of the current Benedict Park. The Preferred Alternative avoids impacts to the mainline of the UPRR and avoids the High Line Rail, a unique and visible feature of the historic Colorado & Wyoming Railroad. In addition, as previously noted, the Preferred Alternative has fewer impacts to properties within the Steelworks Suburbs Historic District.

- ❖ **Section 404 (b)(1) Guidelines.** Waters of the United States, including wetlands, are regulated by the USACE under Section 404 of the Clean Water Act.

Section 404 (b)(1) Guidelines require that the Preferred Alternative selected be the Least Environmentally Damaging Practicable Alternative (LEDPA), that is, the practical alternative that results in a proposed discharge (of dredged or fill material) that would have the least adverse effect on the aquatic environment.

Generally, the analysis of reasonable alternatives provides the information for the evaluation of practicable alternatives under the Section 404 (b)(1) Guidelines. The overall project purpose is used to determine whether practicable alternatives exist to a proposed project. According to 40 CFR 230.10(a)(2), “[a]n alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.” No discharge of dredged or fill material will be permitted “if there is a practicable alternative to the proposed discharge that would have a less adverse impact on the aquatic ecosystem.”

As described in *Chapter 3 – Affected Environment and Environmental Consequences* of the FEIS, the alternatives developed for the project have avoided the majority of waters of the United States, including wetlands, within the study area, as summarized below.

- Wetlands impacts differ by less than 1 acre, with the Preferred Alternative impacting 0.88 acre more wetlands area than the Existing I-25 Alternative. The wetland resources impacted by both Build Alternatives are unavoidable and may be mitigated within the watershed, potentially providing wetlands of equal or greater functional value than those impacted.
- Impacts to waters of the United States (as defined by the USACE) are nearly equal for the two Build Alternatives. Under the Existing I-25 Alternative, the single bridge piers currently in place at the Arkansas River crossing would be removed and replaced; however, they would be placed in the same locations as the existing piers and designed to occupy a slightly smaller footprint. For the Preferred Alternative, 18 new bridge piers would be placed in the Arkansas River to support the bridges for I-25, two ramps, and the extension of Stanton Avenue, resulting in 0.02 acre of impacts to the Arkansas River.
- Although the Existing I-25 Alternative has the least adverse effect on the aquatic environment, the Preferred Alternative with the proposed mitigation has been determined to cause the least overall harm to Section 4(f) properties. The selection of the Existing I-25 Alternative as the LEDPA would cause non-compliance with Section 4(f) legislation and thus is not considered practicable. Therefore, FHWA and CDOT have identified the Preferred Alternative as the LEDPA, and the USACE concurred that the Preferred Alternative appears to be the LEDPA in December 2010.

Conclusion

FHWA and CDOT have identified the Modified I-25 Alternative as the Preferred Alternative for the New Pueblo Freeway because it best meets the project Purpose and Need and, with the proposed mitigation, has been determined to cause the least overall harm to Section 4(f) properties. This is consistent with the requirements of Section 4(f) of the United States Department of Transportation Act of 1966 and Section 404 (b)(1) of the Clean Water Act.

2.3 ENVIRONMENTALLY PREFERABLE ALTERNATIVE

CEQ regulations (40 CFR 1505.2[b]) require this ROD to identify all the alternatives that were considered in the FEIS and to specify the environmentally preferable alternative. The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101: “to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations.” The CEQ has clarified that the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environmental and that best protects, preserves, and enhances historic, cultural, and natural resources. The CEQ regulations do not require FHWA to select the environmentally preferable alternative as the preferred alternative for implementation.

As described in previously in this section, both Build Alternatives share the same impacts in the North Area (Phase 1) and South Area (Phase 2) of the project. The only difference in impacts occurs in the Central Area (Phase 2) of the project between Ilex Street and the Evraz Rocky Mountain Steel Mills. The primary different in impacts between the Build Alternatives and No Action Alternative are described in **Exhibit 2-4** and in the text contained within **Difference in Environmental Impacts Between the**

Alternatives discussed previously in this section. For these comparative reasons, the Preferred Alternative is considered to be the Environmentally Preferable Alternative.

2.4 LEAST ENVIRONMENTALLY DAMAGING PRACTICABLE ALTERNATIVE

As discussed previously in this section, waters of the United States, including wetlands, are regulated by the USACE under Section 404 of the Clean Water Act. Section 404 (b)(1) Guidelines require that the Preferred Alternative selected be the LEDPA, that is, the practical alternative that results in a proposed discharge (of dredged or fill material) that would have the least adverse effect on the aquatic environment. Generally, the analysis of reasonable alternatives provides the information for the evaluation of practicable alternatives under the Section 404 (b)(1) Guidelines.

Implementation of either Build Alternative would result in impacts to wetlands. Wetlands impacts differ by less than 1 acre, with the Preferred Alternative impacting 0.88 acre more wetlands area than the Existing I-25 Alternative. The wetland resources impacted by both Build Alternatives are unavoidable and may be mitigated within the watershed, potentially providing wetlands of equal or greater functional value than those impacted.

Impacts to waters of the United States are nearly equal for the two Build Alternatives. Under the Existing I-25 Alternative, the single bridge piers currently in place at the Arkansas River crossing would be removed and replaced; however, they would be placed in the same locations as the existing piers and designed to occupy a smaller footprint in the Arkansas River. For the Preferred Alternative, 18 new bridge piers would be placed in the Arkansas River to support the bridges for I-25, two ramps, and the extension of Stanton Avenue, resulting in 0.02 acre of impacts to the Arkansas River.

Although the Existing I-25 Alternative has the least adverse effect on the aquatic environment, the Preferred Alternative with the proposed mitigation appears to cause the least overall harm to Section 4(f) properties as discussed in **Section 4 - Section 4(f)** of this document. The selection of the Existing I-25 Alternative as the LEDPA would cause non-compliance with Section 4(f) legislation and thus is not considered practicable. Therefore, FHWA and CDOT have identified the Preferred Alternative as the LEDPA, and the USACE concurred that the Preferred Alternative appears to be the LEDPA in December 2010. CDOT will seek approval for a Section 404 permit prior to any construction impacting waters of the United States.