

NATURAL RESOURCES EVALUATION ADDENDUM

Florida Department of Transportation

District One

State Road (SR) 70

Limits of Project: from Lonesome Island Road to County Road (CR) 721 South

Highlands County, Florida

Financial Management Number: 449851-1-22-01

ETDM Number: 14490

Date: October 2025

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by the Florida Department of Transportation (FDOT) pursuant to 23 U.S.C. § 327 and a Memorandum of Understanding dated May 26, 2022 and executed by the Federal Highway Administration and FDOT.

Table of Contents

Section	Page
1.0 Introduction.....	1-1
1.1 Project Description.....	1-1
1.2 Agency Coordination.....	1-1
1.3 Report Purpose.....	1-3
2.0 Protected Species and Habitat Updates.....	2-1
2.1 Federal Species	2-1
2.1.1 Audubon’s Crested Caracara	2-1
2.1.2 Eastern Indigo Snake	2-2
2.1.3 Eastern Black Rail.....	2-4
2.1.4 Tricolored Bat	2-4
2.2 Wildlife Crossing.....	2-5
2.3 Cumulative Effects.....	2-6
3.0 Commitment Updates	3-1
4.0 Conclusions.....	4-1
4.1 Commitments.....	4-2
5.0 References.....	5-1

List of Tables

Table	Page
Table 2-1 Audubon’s Crested Caracara Primary Zone Suitable Habitat.....	2-1
Table 2-2 Audubon’s Crested Caracara Compensation.....	2-2
Table 2-3 Eastern Indigo Snake Habitat within the Preferred Alternative	2-4
Table 2-4 Summary of Federal Listed Species Effect Determination Changes	2-5
Table 2-5 State Issued Permits.....	2-7
Table 4-1 Federal Listed Species Effect Determinations	4-1

List of Figures

Figure	Page
Figure 1-1 Project Location Map.....	1-2

List of Appendices

Appendix A Agency Coordination

1.0 Introduction

1.1 Project Description

The Florida Department of Transportation (FDOT) District One is conducting a Project Development and Environment (PD&E) study for proposed improvements to the State Road (SR) 70 corridor in Highlands County, Florida. The intent is to enhance safety along the SR 70 corridor, a major east-west roadway spanning the state. The project limits extend approximately 7.6 miles from Lonesome Island Road to the southern leg of County Road (CR) 721.

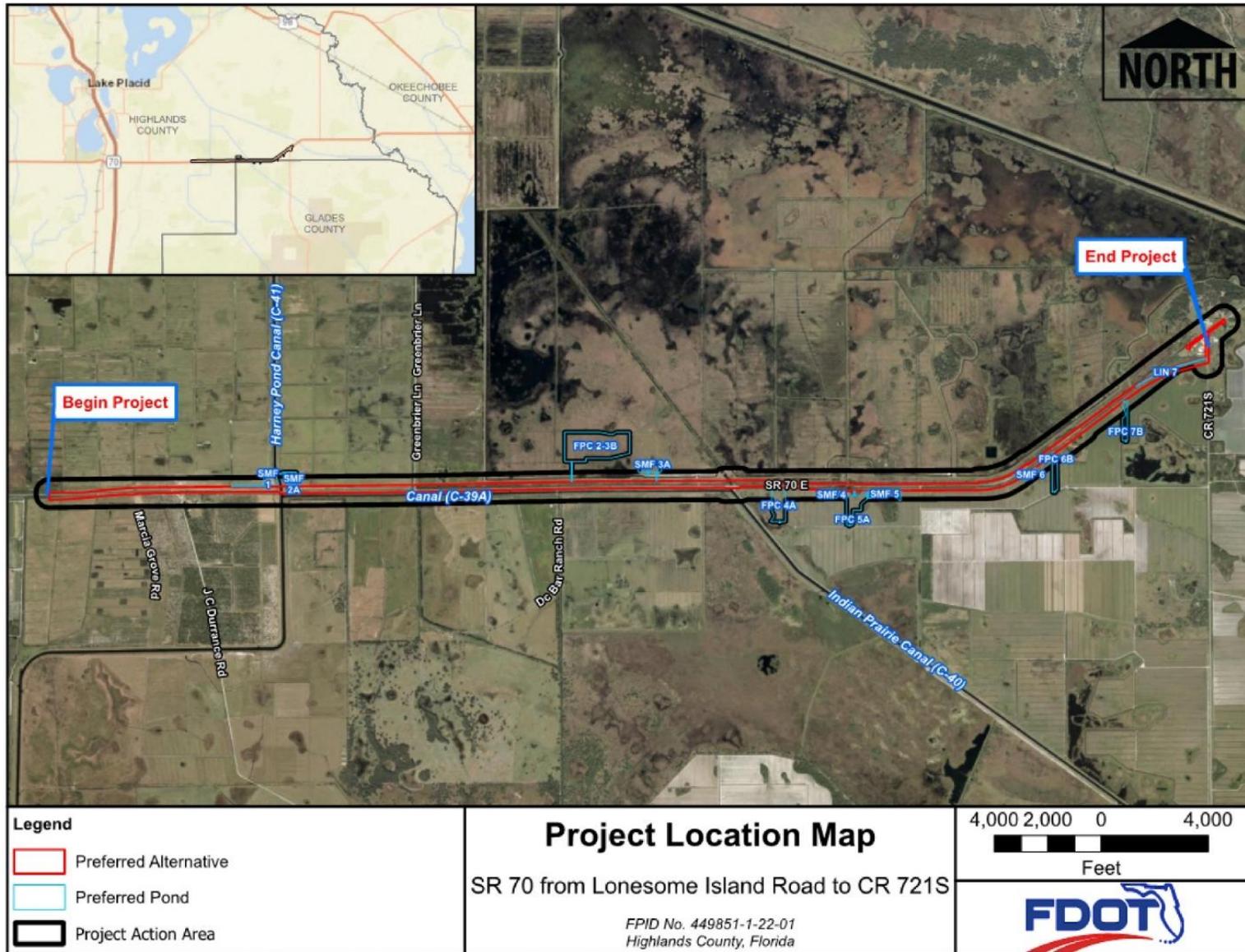
The PD&E study is evaluating the widening of the existing two-lane facility to a four-lane, divided facility, and the inclusion of operational improvements to SR 70 from Lonesome Island Road to CR 721S. Travel lane widths may be widened from 10 feet to 12 feet as part of the project. Multimodal facilities will also be considered along the project segment, where appropriate. Each alternative is being evaluated to determine social and environmental impacts, safety enhancements, additional right-of-way needs, and traffic performance. The existing right-of-way width along SR 70 ranges from 50 to 70 feet. Additional right-of-way is expected to accommodate the proposed improvements. A project location map is provided in **Figure 1-1**. A Natural Resources Evaluation (NRE), dated August 2025, was prepared to evaluate the project action area and Preferred Alternative to document potential impacts to wetland and other surface waters (ditches and canals), federal species and designated critical habitat, state protected species, and Essential Fish Habitat (EFH).

1.2 Agency Coordination

The PD&E study's NRE was sent for agency review and comments on September 10, 2025. The NRE was transmitted in the Efficient Transportation Decision Making (ETDM) Environmental Screening Tool (EST) to National Marine Fisheries Service (NMFS), U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (USACE), Florida Department of Environmental Protection (FDEP), Florida Department of Agriculture and Consumer Services (FDACS)/Florida Forest Service (FFS), Florida Fish and Wildlife Conservation Commission (FWC), and South Florida Water Management District (SFWMD). Agencies provided comments during the 30-day review period which are included in **Appendix A**.

Additionally, in accordance with Section 7 of the Endangered Species Act of 1973, as amended (ESA), the FDOT Office of Environmental Management (OEM) sent the NRE to U.S. Fish and Wildlife Service (USFWS) for review and requested to initiate formal consultation on September 5, 2025 (**Appendix A**) due to the project's effect determination of "may affect, and is likely to adversely affect" for Audubon's crested caracara (*Caracara plancus audubonii*), eastern black rail (*Laterallus jamaicensis jamaicensis*), eastern indigo snake (*Drymarchon couperi*), and Florida panther (*Puma concolor coryi*). The USFWS requested additional information from FDOT, and a meeting was held on September 30, 2025 with FDOT and USFWS to provide initial responses and clarify directions to provide responses in this NRE Addendum (**Appendix A**).

Figure 1-1 Project Location Map



1.3 Report Purpose

This report provides an addendum to the PD&E study's NRE dated August 2025. The project action area and Preferred Alternative were not changed from the August 2025 NRE. The following sections include updates to federal listed species effect determinations and project commitments included in the August 2025 NRE that require revisions as a result of coordination with USFWS and the associated September 30, 2025 meeting with USFWS regarding Audubon's crested caracara, eastern black rail, eastern indigo snake, tricolored bat (*Perimyotis subflavus*), and wildlife crossing fencing (**Appendix A**).

2.0 Protected Species and Habitat Updates

The project’s effect determinations on federal listed species was initially made in the August 2025 NRE. As a result of coordination with USFWS, additional information is provided in this section for Audubon’s crested caracara and eastern indigo snake along with adding a cumulative impacts section and revisions to the eastern black rail and tricolored bat effect determinations.

2.1 Federal Species

2.1.1 Audubon’s Crested Caracara

As a result of the September 2025 coordination with USFWS, additional information is provided regarding Audubon’s crested caracara nest locations and to confirm the project’s proposed primary zone impacts and mitigation. The August 2025 NRE included a total of 22.19 acres of primary zone Audubon’s crested caracara nesting habitat however this total incorrectly included unsuitable land use habitats: (FLUCFCS 810) Roads and Highways, (FLUCFCS 512) Canals and (FLUCFCS 510) Streams and Waterways. Therefore, suitable habitat within Audubon’s crested caracara nest primary zone was recalculated for Nest 1, Nest 3 and Nest 4 (**Table 2-1**) and resulted in a total of 14.91 acres to be impacted by the project’s Preferred Alternative within the project action area. The habitats included in the primary zone impact are wet prairies, abandoned groves, improved pastures and sugar cane (**Table 2-1**). There will not be Incidental Take of the species or any nest trees, only impacts to occupied nesting habitat are proposed. To reduce adverse effects resulting from impacts to Audubon’s crested caracara occupied nesting habitat, the FDOT commits to a total contribution of \$89,476.20 to the Caracara Fund (**Table 2-2**), administered through the Fish and Wildlife Foundation of Florida, for activities affecting the primary zone of documented nests during the 2023 nesting season. This amount is based on a calculation of \$6,000 per acre, which is below the 2025 Farm Real Estate Value by State average value for Florida farm real estate, estimated at \$8,700 per acre. **Table 2-2** shows the recommended compensation contribution to the Caracara Fund for actions impacting caracara suitable occupied habitat within each nest’s primary zone.

Table 2-1 Audubon’s Crested Caracara Primary Zone Suitable Habitat

Nest ID (2023 Breeding Season)	FLUCFCS Classification	FLUCFCS Description	Acreage of Audubon's Crested Caracara Primary Zone Suitable Habitat
Nest 1	211	Improved Pastures	1.41
	224	Abandoned Groves	0.01
Nest 3	215	Sugar Cane	7.83
	643	Wet Prairie	0.84
Nest 4	215	Sugar Cane	4.82
Total			14.91

Table 2-2 Audubon’s Crested Caracara Compensation

Nest ID (2023 Breeding Season)	Nest Coordinates (Lat., Long.)	Number of acres lost (Primary Zone Impacts)*	Compensation
Nest 1	27.2067136, -81.2000479	1.42	\$8,534.40
Nest 3	27.210063, -81.128955	8.67	\$52,024.80
Nest 4	27.2098631, -81.1107925	4.82	\$28,917.00
Total		14.91	\$89,476.20

*Acreages in the table are rounded to the nearest hundredth.

The effect determination for Audubon’s crested caracara remains “**may affect, likely to adversely affect.**” Therefore, formal consultation with USFWS will be completed for Audubon’s crested caracara.

2.1.2 Eastern Indigo Snake

During the September 2025 coordination with the USFWS regarding the eastern indigo snake, USFWS stated that in addition to the documented occurrence included in the August 2025 NRE, USFWS has additional historical documentation of eastern indigo snake occurrences along SR 70 in the project action area. Furthermore, USFWS recommended a contribution be made to the Eastern Indigo Snake Conservation Fund as potential mitigation to assist with offsetting the adverse effects to eastern indigo snake from increased habitat fragmentation and increased road mortality resulting from the proposed road widening and increased capacity. USFWS recommended a contribution of \$78,000 based on an estimated take of six (6) eastern indigo snakes with an approximate cost of \$13,000 per eastern indigo snake. As agreed with USFWS, FDOT may use eastern indigo snake credits from Platt Branch Mitigation Bank (PBMB) as a mitigative alternative to monetary contribution. PBMB is a USFWS approved conservation bank with available eastern indigo snake credits. USFWS has previously accepted use of eastern indigo snake credits from PBMB for the adjacent SR 70 PD&E Study from CR 29 to Lonesome Island Road, as documented in a Biological Opinion, USFWS Consultation Code: 04EF2000-2019-F-0187.

Land uses within the Preferred Alternative, which includes the proposed roadway and stormwater management facilities, presented in **Table 2-3** are considered suitable eastern indigo snake habitat. Seasonally and temporarily flooded wetland systems were included with the assumption that the eastern indigo snake could utilize these areas when dry. The project’s proposed floodplain compensation (FPC) sites were not included as habitat to be impacted by the Preferred Alternative since this area will be suitable eastern indigo snake habitat after construction of the project. Additionally, roads and highways (FLUCFCS 814), reservoirs (FLUCFCS 530) and streams and waterways (FLUCFCS 510) were excluded as suitable habitat for eastern indigo snakes. As a

result, there are approximately 152.80 acres of potential eastern indigo snake habitat that will be impacted from construction of the project's roadway improvements and stormwater management facilities (**Table 2-3**).

To offset the Preferred Alternative's impacts to 152.80 acres of eastern indigo snake suitable habitat, the following commitment has been made: FDOT will provide 152.80 eastern indigo snake acre credits from PBMB which include land cover types that provide habitat for the eastern indigo snake. The FDOT will provide USFWS with a letter or email from the PBMB stating that the credit ledger for the bank has been revised to reflect the deduction of credits. The FDOT will not commence construction of the proposed project until a response email or letter from USFWS has been received stating that they have received the document.

Due to the project not currently being funded for construction, if eastern indigo snake credits are not available from PBMB, FDOT will contribute \$78,000 to the Eastern Indigo Snake Conservation Fund or an agreed amount by USFWS if a portion of the credits are provided by PBMB.

Based on guidance from USFWS, the estimated cost per eastern indigo snake was calculated based on the following:

- Estimated cost to raise one eastern indigo snake is approximately \$13,000.
- Eastern indigo snake metrics for Central South Florida
 - Average Home Range area (Males + Females) = 244.75 ac (Bauder et al. 2016)
 - Home Range Overlap = 4 (Bauder et al. 2016)
 - Average Home Range Width (Males + Females) = 1.2 miles (Bauder unpublished data)
 - Probability of crossing tertiary road is 0.23 to 0.35 (Bauder et al. 2018)
 - Tertiary road = paved 2-lane rural roads
- Project information
 - Buffer of road by 1.2 miles
 - Clip of eastern indigo snake habitat/population unit from buffer area = 2,797 acres
 - Eastern indigo snake average home range in this area = $2,797 \text{ acres} / 244.75 = 11.43$ eastern indigo snakes
 - Eastern indigo snake overlap: $11.43 \text{ eastern indigo snakes} \times 4 = 45.72$, but habitat is fair to poor so reduced by half = $45.72 / 2 = 22.86$ eastern indigo snakes
- Probability of 22.86 eastern indigo snakes crossing road = $22.86 \times 0.23 = 5.2578 = \mathbf{5.26}$
 - Estimate half of those would be result in mortality = 2.6 (round up to 3)
 - Other half are harmed due to long term fragmentation effects because four-lane roadway acts as a barrier (Bauder et al. 2018) = 2.6 (rounded up to 3)
- **Total estimated take = six (6) eastern indigo snakes**
 - **Recovery contribution = \$13,000 x 6 eastern indigo snakes = \$78,000**

The effect determination for the eastern indigo snake remains “**may affect, likely to adversely affect.**” Therefore, formal consultation with USFWS will be completed for the eastern indigo snake.

Table 2-3 Eastern Indigo Snake Habitat within the Preferred Alternative

Project Component	FLUCFCS Classification	FLUCFCS Description	Acreage of Eastern Indigo Snake Habitat
Mainline Corridor and Stormwater Management Facilities	211	Improved pastures	52.140
	212	Unimproved pastures	36.143
	215	Sugar cane	51.907
	224	Abandoned groves	1.626
	310	Herbaceous (dry prairie)	0.000
	320	Upland shrub and brush	0.000
	428	Cabbage palm	1.745
	641	Freshwater marshes	6.181
	643	Wet prairie	3.061
Total Eastern Indigo Snake Habitat			152.803

2.1.3 Eastern Black Rail

Based on review of the August 2025 NRE and habitat in the project action area, USFWS has completed an additional evaluation for the potential of eastern black rail to occur in the project area. USFWS has documented occurrences in the vicinity of the project action area. However, during coordination with USFWS in September 2025, USFWS stated the eastern black rails are not likely to occur within the project action area due to poor quality habitat. Therefore, FDOT has updated the project’s effect determination on the eastern black rail to “**may affect, not likely to adversely affect**” (Table 2-4). Additionally, FDOT has added the following commitment: if eastern black rails are observed in the project’s action area prior to or during construction, consultation with USFWS will be reinitiated.

2.1.4 Tricolored Bat

During coordination with USFWS, a discussion occurred regarding the tricolored bat effect determination in the August 2025 NRE. USFWS stated as the Final Rule for listing the tricolored bat as Endangered has not been published, consultation is at the discretion of FDOT. There is overlap between Florida bonneted bat (FBB) Best Management Practices (BMPs) and the BMPs being developed for the tricolor bat, however the time of year restrictions being drafted for tricolor bat are more restrictive than FBB BMP restrictions FDOT committed to be used for the project.

As a result, FDOT will not complete consultation with USFWS on the tricolored bat at this time. Therefore, the projects effect determination on the tricolored bat has been updated to “**Not Applicable**”. Therefore, FDOT has added a commitment; if the tricolored bat is listed by the USFWS as threatened or endangered prior to the completion of construction, FDOT commits to reinitiating consultation with USFWS to determine appropriate avoidance and minimization measures. With the addition of this commitment, the tricolored bat commitments listed in the

August 2025 NRE have been removed (see section 3.0 Commitment Updates of this NRE Addendum).

The project’s commitments for the FBB have not changed. The commitment to use FBB BMP #1 requires potential roost structures to be removed be checked for bats within 30 days prior to removal of structures. Therefore, the two bridges within the project limits will be inspected to confirm presence or absence of bats within bridge crevices prior to removal of the bridges.

Table 2-4 Summary of Federal Listed Species Effect Determination Changes

Federal Listed Species	August 2025 NRE Effect Determination	October 2025 NRE Addendum Effect Determination
Eastern black rail	“May affect, likely to adversely affect”	“May affect, not likely to adversely affect”
Tricolored bat	“May affect, not likely to adversely affect”	“Not Applicable”

2.2 Wildlife Crossing

During the September 2025 coordination with USFWS, a request was made for additional details associated with the project’s proposed wildlife crossings. The August 2025 NRE included a commitment to design and construct wildlife shelves at the bridge crossings over the SFWMD canals (Canal C-40 and C-41). These canal locations also include access points for SFWMD to enter their property along canal banks to conduct maintenance activities for each SFWMD canal. FDOT will coordinate with SFWMD during the Design Phase to evaluate each canal crossing to determine locations and lengths of funnel fencing, with herpetofauna fencing, to be installed without precluding SFWMD canal access and the ability of SFWMD to conduct maintenance activities for their canals. Additionally, to promote usage of wildlife crossings, a commitment has been added. FDOT will install landscaping utilizing native vegetation within the FDOT right-of-way and the limits of funnel fencing. Therefore, FDOT has added the following two commitments to promote wildlife utilization of the project’s proposed wildlife crossings and to reduce vehicle strikes and road mortality of listed and protected species crossing this area of SR 70.

- FDOT will coordinate with SFWMD during the Design Phase to evaluate each canal crossing to determine locations and lengths of herpetofauna funnel fencing to be installed without precluding SFWMD canal access and maintenance of canals.
- FDOT will install landscaping utilizing native vegetation within the FDOT right-of-way and limits of funnel fencing.

2.3 Cumulative Effects

USFWS also requested information on cumulative effects associated with the project. USFWS defines “cumulative effects” considered in a Biological Opinion as the effects of future State, Tribal, local, or private actions (i.e., non-federal actions usually not subject to consultation by USFWS pursuant to Section 7 of the ESA) reasonably certain to occur in the project action area. The effects of these non-federal actions are analyzed with the effects of the proposed project when conducting the jeopardy analysis. USFWS’ definition of cumulative effects does not include future federal actions unrelated to the proposed action because those federal actions require separate consultation pursuant to Section 7 of the ESA.

To estimate future non-federal actions in the project action area, USFWS requested that recent non-federal actions in the action area be identified and tabulated. Recent non-federal actions are those development projects that have occurred in the action area during the last three years (2023 -2025) and have resulted in the loss of panther, caracara, and/or eastern indigo snake habitat. The USFWS considers these recent actions as representative of future non-federal actions that are likely to occur in the action area.

Review of ETDM future land use maps, Development of Regional Impacts (DRIs), and Planned Unit Developments (PUDs) in Highlands and Glades Counties within approximately five miles of the Preferred Alternative resulted in no DRIs or PUDs with planned development. Additionally, a permit search was completed for the same area and for state issues permits (**Table 2-5**) to identify permits issued with no federal nexus. There are several FDEP permits issued for utility related improvements however those improvements and required permits include a federal nexus with the Federal Energy Regulatory Commission (FERC) and USACE permits. All the state permits issued (**Table 2-5**) in the area authorized agricultural improvements that do not result in the loss of habitat for federal listed species including Audubon’s crested caracara, eastern indigo snake or Florida panther.

Based on review of existing permits and future land use maps that include only agricultural and conservation lands, adverse cumulative effects are not expected to occur within the project action area.

Table 2-5 State Issued Permits

Permit No.	Project Name	Issue / Modification Date	Permittee	Activity / Reason for Permit	Additional Information
<i>South Florida Water Management District</i>					
28-00123-S-02	Sunray	2/6/2023	Florida Power and Light Company	Surface water management (SWM) system construction and operation	This Environmental Resource Permit (ERP) authorized construction and operation of a stormwater management (SWM) system serving a 609.58-acres of agricultural development known as Sunray Grove A.
28-00138-S	3 W Ranch	8/27/2024	3 W Ranch LLC	Surface water management (SWM) system construction and operation	This Surface Water Management Permit authorizes operation of a stormwater management (SWM) system serving 310-acres of agricultural development known as Lake Placid Grove.
28-110862-P	All Cattle No Hat Pasture	10/10/2024	All Cattle No Hat LLC	Surface water management (SWM) system modification for barn construction	This ERP authorized modification to the stormwater management (SWM) system serving 14.9-acres within the permitted 210-acre development known as Lonesome Island III (Smoak) Grove, construction of which was originally permitted under Permit No. 28-00211-S. Project proposes regrading a portion of the 14.7-acre project area for the construction of a barn for agricultural activities (cattle grazing) within the remaining project area, formerly a minor above ground impoundment (AGI).
28-00097-S	Southwinds	7/22/2025	T&T Cattle, LLC	Surface water management (SWM) system construction and operation	This ERP authorized construction and operation of a stormwater management (SWM) system serving 330-acres of agricultural land known as Southwinds.

3.0 Commitment Updates

Based on coordination with the USFWS, seven (7) commitments were added and two (2) commitments were removed from the PD&E study's project commitment record. These new commitments and removed commitments are presented below.

To minimize project impacts on listed and protected species to the greatest extent practicable, the following project commitments were added and will be adhered to:

- FDOT will provide a financial contribution of \$89,476.20 to the Crested Caracara Conservation Fund for the project's impacts to Audubon's crested caracara primary zones of three nests.
- FDOT will provide 152.80 eastern indigo snake acre credits from Platt Branch Mitigation Bank (PBMB) which include land cover types that provide habitat for the eastern indigo snake. The FDOT will provide USFWS with a letter or email from the PBMB stating that the credit ledger for the bank has been revised to reflect the deduction of credits. The FDOT will not commence construction of the proposed project until a response email or letter from USFWS has been received stating that they have received the document.
- Due to the project not currently being funded for construction, if eastern indigo snake credits are not available from PBMB, FDOT will contribute \$78,000 to the Eastern Indigo Snake Conservation Fund or an agreed amount by USFWS if a portion of the credits are provided by PBMB.
- If the tricolored bat is listed by the USFWS as threatened or endangered prior to the completion of construction, FDOT commits to reinitiating consultation with USFWS to determine appropriate avoidance and minimization measures.
- If eastern black rails are observed in the project's action area prior to or during construction, consultation with USFWS will be reinitiated.
- FDOT will coordinate with SFWMD during the Design Phase to evaluate each canal crossing to determine locations and lengths of herpetofauna funnel fencing to be installed without precluding SFWMD canal access and maintenance of canals.
- FDOT will install landscaping utilizing native vegetation within the FDOT right-of-way and limits of funnel fencing.

As a result of changes to the tricolored bat effect determination to "Not Applicable", the following two tricolored bat commitments have been removed as commitments for the PD&E study.

- Upon listing of the tricolored bat, if the project contains suitable habitat and requires tree trimming and/or clearing, FDOT will not conduct tree trimming/clearing activities during the tricolored bat pup season (May 1st to July 15th) and when bats may be in torpor (when temperatures are below 45 degrees Fahrenheit).
- Upon listing of the tricolored bat, if the project contains suitable habitat and FDOT needs to trim or clear trees or perform work on bridges/culverts during the maternity season and/or when the temperature is below 45 degrees Fahrenheit, then FDOT will survey the project area for evidence of the tricolored bat. The *Indiana Bat and Northern Long-eared*

Bat Survey Guidance, Appendix J Acoustic Survey Protocol in the year-round range (mist netting is not being conducted in Florida at this time), will be used for areas with tree trimming/clearing. For bridges and culverts, the *Indiana Bat and Northern Long-eared Bat Survey Guidance, Appendix K, Assessing Bridges and Culverts for Bats*, will be used.

- If the surveys result in no tricolored bats detected, then FDOT can proceed with the project activities. Negative results from bridge/culvert surveys are valid for 2 years. Negative results for acoustic surveys are valid for 5 years. However, negative results for either survey may be invalidated if additional tricolored bat survey data is submitted to USFWS showing presence of the species within the vicinity of the project area. Additional survey work by FDOT, or application of the avoidance and minimization measures noted previously, may be required if updated detections are reported, and may result in reinitiation of consultation with USFWS.
- If the surveys result in positive detections of the tricolored bat, FDOT will implement conservation measures such as: not conducting tree trimming/clearing activities during the tricolored bat pup season (May 1st to July 15th) when pups are not volant and not able to escape disturbance; similarly avoid tree trimming/clearing activities when the temperatures are below 45 degrees Fahrenheit when bats may be in torpor and unresponsive to disturbance

4.0 Conclusions

Coordination with USFWS regarding the August 2025 NRE has resulted in changes to federal listed species' effect determinations and updated commitments. The changes in species effect determinations in this NRE Addendum included the tricolored bat and eastern black rail. These updated federal listed species effect determinations for tricolored bat and eastern black rail are included with the project's effect determinations for federal listed species in **Table 4-1**.

Table 4-1 Federal Listed Species Effect Determinations

Project Effect Determinations	Federal Listed Species
"Not Applicable"	Tricolored bat (<i>Perimyotis subflavus</i>)
"No effect"	Pygmy fringe-tree (<i>Chionanthus pygmaeus</i>)
	Pigeon wings (<i>Clitoria fragrans</i>)
	Short-leaved rosemary (<i>Conradina brevifolia</i>)
	Avon Park harebells (<i>Crotalaria avonensis</i>)
	Garrett's mint (<i>Dicerandra christmanii</i>)
	Scrub mint (<i>Dicerandra frutescens</i>)
	Snakeroot (<i>Eryngium cuneifolium</i>)
	Highlands scrub hypericum (<i>Hypericum cumulicola</i>)
	Scrub blazingstar (<i>Liatris ohlingerae</i>)
	Papery whitlow-wort (<i>Paronychia chartacea</i>)
	Lewton's polygala (<i>Polygala lewtonii</i>)
	Wireweed (<i>Polygonella basiramia</i>)
	Sandlace (<i>Polygonella myriophylla</i>)
	Carter's mustard (<i>Warea carteri</i>)
	Florida ziziphus (<i>Ziziphus celata</i>)
	Florida perforate cladonia (<i>Cladonia perforata</i>)
	Blue-tailed mole skink (<i>Plestiodon egregius lividus</i>)
	Sand skink (<i>Plestiodon reynoldsi</i>)
	Florida grasshopper sparrow (<i>Ammodramus savannarum floridanus</i>)
Florida scrub-jay (<i>Aphelocoma coerulescens</i>)	
"May affect, not likely to adversely affect"	Florida bonneted bat (<i>Eumops floridanus</i>)
	Eastern black rail (<i>Laterallus jamaicensis jamaicensis</i>)
	Wood stork (<i>Mycteria americana</i>)
	Everglade snail kite (<i>Rostrhamus sociabilis plumbeus</i>)
"May affect, likely to adversely affect"	Audubon's crested caracara (<i>Caracara plancus audubonii</i>)
	Eastern indigo snake (<i>Drymarchon couperi</i>)
	Florida panther (<i>Puma concolor coryi</i>)

4.1 Commitments

To minimize project impacts on wetlands, surface waters, other surface waters (ditches and canals), and protected species and their habitats to the greatest extent practicable, the following commitments will be adhered to based on the August 2025 NRE and updates documented in this NRE Addendum:

- FDOT will require contractors to remove garbage daily from the construction site or use bear proof containers for securing of food and other debris from the project work area to prevent these items from becoming an attractant for the Florida black bear (*Ursus americanus floridanus*). Any interaction with nuisance bears will be reported to the FWC Wildlife Alert hotline 888-404-FWCC (3922).
- If the monarch butterfly is listed by USFWS as Threatened or Endangered, FDOT commits to reinitiating consultation with USFWS to determine appropriate avoidance and minimization measures for protection of the newly listed species.
- The most recent version of the USFWS *Standard Protection Measures for the Eastern Indigo Snake* will be implemented during construction.
- A survey will be conducted for Audubon's crested caracara per USFWS protocol during the design phase.
- FDOT will provide mitigation for impacts to wood stork Suitable Foraging Habitat within the Service Area of a Service-approved wetland mitigation bank or wood stork conservation bank.
- FDOT will mitigate habitat impacts to the Florida panther by providing 951 PHUs from the Platt Branch Conservation Mitigation Bank.
- FDOT commits to design and constructing wildlife shelves at the bridge crossings over the SFWMD canals (Canal C-40 and C-41), per current wildlife crossing guidelines.
- In accordance with the Florida Bonneted Bat Consultation Key, FDOT will implement Best Management Practice #1: If potential roost trees or structures need to be removed, check cavities for bats within 30 days prior to removal of trees, snags, or structures. When possible, remove structure outside of breeding season (e.g., January 1 – April 15). If evidence of use by any bat species is observed, discontinue removal efforts in that area and coordinate with the USFWS on how to proceed.
- In accordance with the Florida Bonneted Bat Consultation Key, FDOT will implement Best Management Practice #5: Conserve open freshwater and wetland habitats to promote foraging opportunities and avoid impacting water quality. Created/restored habitat should be designed to replace the function of native habitat.
- In accordance with the Florida Bonneted Bat Consultation Key, FDOT will implement Best Management Practice #7: Avoid or limit widespread application of insecticides (e.g., mosquito control, agricultural pest control) in areas where Florida bonneted bats are known or expected to forage and roost.
- In accordance with the Florida Bonneted Bat Consultation Key, FDOT will implement Best Management Practice #11: Avoid and minimize the use of artificial lighting, retain natural

light conditions, and install wildlife friendly lighting (i.e., downward facing, and lowest lumens possible). Avoid permanent night-time lighting to the greatest extent practicable.

- FDOT will provide a financial contribution of \$89,476.20 to the Crested Caracara Conservation Fund for the project's impacts to Audubon's crested caracara primary zones of three nests.
- FDOT will provide 152.80 eastern indigo snake acre credits from Platt Branch Mitigation Bank (PBMB), which include land cover types that provide habitat for the eastern indigo snake. The FDOT will provide USFWS with a letter or email from the PBMB stating that the credit ledger for the bank has been revised to reflect the deduction of credits. The FDOT will not commence construction of the proposed project until a response email or letter from USFWS has been received stating that they have received the document.
- Due to the project not currently being funded for construction, if eastern indigo snake credits are not available from PBMB, FDOT will contribute \$78,000 to the Eastern Indigo Snake Conservation Fund or an agreed amount by USFWS if a portion of the credits are provided by PBMB.
- If the tricolored bat is listed by the USFWS as threatened or endangered prior to the completion of construction, FDOT commits to reinitiating consultation with USFWS to determine appropriate avoidance and minimization measures.
- If eastern black rails are observed in the project's action area prior to or during construction, consultation with USFWS will be reinitiated.
- FDOT will coordinate with SFWMD during the Design Phase to evaluate each canal crossing to determine locations and lengths of herpetofauna funnel fencing to be installed without precluding SFWMD canal access and maintenance of canals.
- FDOT will install landscaping utilizing native vegetation within the FDOT right-of-way and limits of funnel fencing.

5.0 References

- Bauder, J.M., D.R. Breininger, M.R. Bolt, M.L. Legare, C.L. Jenkins, B.B. Rothermel, and K. McGarigal. 2016. *The Influence of Sex and Season on Conspecific Spatial Overlap in a Large, Actively-Foraging Colubrid Snake*. PLoS ONE 11(8): e0160033. doi: <https://doi.org/10.1371/journal.pone.0160033>
- Bauder, J.M., D.R. Breininger, M.R. Bolt, M.L. Legare, C.L. Jenkins, B.B. Rothermel, and K. McGarigal. 2018. *Multi-level, multi-scale habitat selection by a wide-ranging, federally threatened snake*. Landscape Ecol 33, 743-763 (2018). <https://doi.org/10.1007/s10980-018-0631-2>
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. *Classification of Wetlands and Deepwater Habitats of the United States*. U.S. Department of Interior, Fish and Wildlife Service Office of Biological Services. Technical Publication FWC/OBS-79/31. 91 pp. ([Classification of Wetlands and Deepwater Habitats of the United States \(fws.gov\)](https://www.fws.gov)).
- Florida Department of Agriculture and Consumer Services (FDACS). 2025. ([Endangered, Threatened and Commercially Exploited Plants of Florida / Florida's Endangered Plants / Botany / Protect Our Environment / Consumer Resources / Home - Florida Department of Agriculture & Consumer Services \(fdacs.gov\)](https://www.fdacs.gov)).
- Florida Department of Transportation (FDOT). January 1999. *Florida Land Use, Cover and Forms Classification System*. Tallahassee, Florida. 95 pp. ([FLUCC manual.PDF \(nwfwater.com\)](https://www.nwfwater.com)).
- FDOT. 2024. *Project Development and Environment Manual*. Tallahassee, Florida (https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/environment/pubs/pdeman/2024/pd-e-manual-2024_final_073124.pdf?sfvrsn=746c6ea6_1)
- Southwest Florida Water Management District (SWFWMD). 2020. Florida Land Use, Cover, and Forms Classification System GIS Database. ([The Florida Geographic Data Library \(FGDL\) Geospatial Data Clearinghouse Node](https://www.fgdlib.org)).
- U.S. Department of Agriculture. 2025 *Farm Real Estate Value by State*. [www.nass.usda.gov/Charts and Maps/graphics/farm_value_map.pdf](https://www.nass.usda.gov/Charts_and_Maps/graphics/farm_value_map.pdf)

Appendix A

Agency Coordination

1. NMFS Comments on August 2025 NRE
2. FDACS-FFS NRE Comments on August 2025 NRE
3. SFWMD Comments on August 2025 NRE
4. FDEP Comments on August 2025 NRE
5. FWC Comments on August 2025 NRE
6. USACE Comments on August 2025 NRE
7. OEM September 5, 2025 Request to Initiate Formal Consultation with August 2025 NRE
8. OEM and USFWS September 30, 2025 Meeting Summary