

STATE OF FLORIDA DEPARTMENT OF TRANSPORTATION
TECHNICAL REPORT COVERSHEET

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MANAGEMENT
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SECTION 106 CASE STUDY REPORT

Florida Department of Transportation

District One

Old SR 18/Mahon Avenue (8DE00828) Case Study for

State Road (SR) 70 Project Development and Environment (PD&E) Study

W. of SR 31 to SE Highlands County Line Rd.

DeSoto County, Florida

Financial Management Number: 451942-1-22-01

ETDM Number: 14569

Date: August 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 2, 2022 and executed by the Federal Highway Administration and FDOT.

SECTION 106 CASE STUDY REPORT

OLD SR 18/MAHON AVENUE (8DE00828) FOR

STATE ROAD (SR) 70 PROJECT DEVELOPMENT AND ENVIRONMENT

(PD&E) STUDY W. OF SR 31 TO SE HIGHLANDS COUNTY LINE ROAD

DESOTO COUNTY, FLORIDA

Financial Project Identification No.: 451942-1-22-01

Federal Aid Project Number: TBD

ETDM No.: 14569

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August 2025

EXECUTIVE SUMMARY

The Florida Department of Transportation (FDOT), District One, is proposing to widen approximately 16.7 miles of State Road (SR) 70 from west of SR 31 to SE Highlands County Line Road in unincorporated DeSoto County, Florida. The proposed action is to address traffic safety conditions of the existing two-lane undivided roadway by widening it to a four-lane divided roadway, with the inclusion of safety and operational improvements as needed to accomplish the project Purpose and Need. The project will include the construction of wildlife crossing features, roadway signing and pavement markings, and stormwater management facilities including treatment ponds and floodplain compensation sites. The Area of Potential Effects (APE) for archaeology consists of the existing right of way (ROW) containing the improvements and the APE for historic resources consists of the existing ROW and adjacent parcels up to 200 feet (ft) (61 meters [m]).

PaleoWest, LLC (dba Chronicle Heritage) completed a Phase I Cultural Resource Assessment Survey (CRAS) for the APE under separate cover (de Gregory et al. 2025). During the CRAS, Chronicle Heritage identified previously recorded resource 8DE00828 (Old SR 18/Mahon Avenue) within the APE. The Florida State Historic Preservation Office (SHPO) determined 8DE00828 eligible for the National Register of Historic Places (NRHP) on May 12, 2009. As indicated in the report, the boundary of the NRHP-eligible segment of the resource extends between the areas surrounding Manley Avenue and the area surrounding Guynn Avenue. This portion of the resource is approximately 2.8 miles in length. The purpose of the Case Study Report (CSR) is to: 1) summarize FDOT's efforts to develop project alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects; 2) to evaluate the effects of the project on historic properties within the APE; 3) to propose potential mitigation measures to resolve adverse effects; and 4) to summarize public coordination efforts to date.

A No Action (No Build) Alternative, two Limited Development (Avoidance) Alternatives, a Minimization Alternative, and a Build Alternative were evaluated for the project. The No Action (No Build), two Limited Development (Avoidance) Alternatives and a Minimization Alternative that have been evaluated are not recommended as none satisfy the project's need nor definitively avoid adverse effects to Old SR 18/Mahon Avenue (8DE00828). The No Action (No Build) alternative was evaluated to completely avoid impacting Old SR 18/Mahon Avenue but is not recommended as it would not correct the need to maintain connectivity and accommodate freight; it would not correct existing safety conditions; and it would not correct existing or deteriorated conditions and maintenance problems.

Several other Avoidance and Minimization alternatives were evaluated to minimize impacts to Old SR 18/Mahon Avenue, but these resulted in constructability issues, impacts for adjacent property access and potential roadway safety issues. The Build Alternative, which requires demolition of approximately 2.8 miles of Old SR 18/Mahon Avenue between Manley Rd. and Guynn Avenue has been identified as the Preferred Alternative. The impacts are necessary/unavoidable to

accommodate the proposed roadway and drainage footprint within the existing SR 70 right-of-way (ROW). There is no feasible alternative to this demolition that meets the needs of the project without resulting in roadway safety and/or additional environmental impacts. In accordance with 36 CFR § 800.5(a)(2)(i), the preferred alternative will have an adverse effect on 8DE00828.

FDOT has proposed mitigation measures to resolve the adverse effect. However, additional measures can be arrived at through consultation with FDOT, SHPO, the public, and other potential consulting parties.

Pursuant to Public Law 113-287 (Title 54 U.S.C.), FDOT will make the information presented in this Case Study Report available to the public and will provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. No comments have been received thus far, but the public comment period will remain open throughout the development of the Memorandum of Agreement (MOA), and all comments received will be taken into consideration in the development of the project.

Should avoidance of adverse effects not be possible, FDOT will execute an MOA with SHPO pursuant to 36 CFR § 800.6(c) to document final mitigation measures.

This study complies with Public Law 113-287 (Title 54 U.S.C.), which incorporates the provisions of the National Historic Preservation Act (NHPA) of 1966, as amended, and the Archeological and Historic Preservation Act of 1979, as amended. The study also complies with the regulations for implementing NHPA Section 106, found in 36 CFR, Part 800 (Protection of Historic Properties). All review work was performed in accordance with Part 2, Chapter 8, of the FDOT's Project Development and Environment (PD&E) Manual, and the Florida Division of Historical Resources' (FDHR) recommendations for such projects, as stipulated in the FDHR's Cultural Resource Management Standards & Operations Manual, Module Three: Guidelines for Use by Historic Preservation Professionals. The Principal Investigator for this project meets the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716-42). This effects assessment is also conducted to comply with Chapter 267 of the Florida Statutes and Rules Chapter 1A-46, Florida Administrative Code.

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- Appendix B: SHPO Consultation Letter
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1 PROJECT INTRODUCTION

1.1 Project Description

The Florida Department of Transportation (FDOT), District One, is proposing to widen approximately 16.7 miles (mi) of State Road (SR) 70 from west of SR 31 to SE Highlands County Line Road in unincorporated DeSoto County, Florida. The project is located in Sections 32–36 of Township (T) 37 South (S), Range (R) 25 East (E); Sections 31–36 of T37S, R26E; Sections 31–36 of T37S, R27E; Sections 1–5 of T38S, R25E; Sections 1–6 of T38S, R26E; and Sections 1–6 of T38S, R27E on the Arcadia, Florida quadrangle (**Figure 1-1**).

The proposed action is to address traffic safety conditions of the existing two-lane undivided roadway by widening it to a four-lane divided roadway, with the inclusion of safety and operational improvements as needed to accomplish the project Purpose and Need. The project will include the construction of wildlife crossing features, roadway signing and pavement markings, and stormwater management facilities including treatment ponds and floodplain compensation sites.

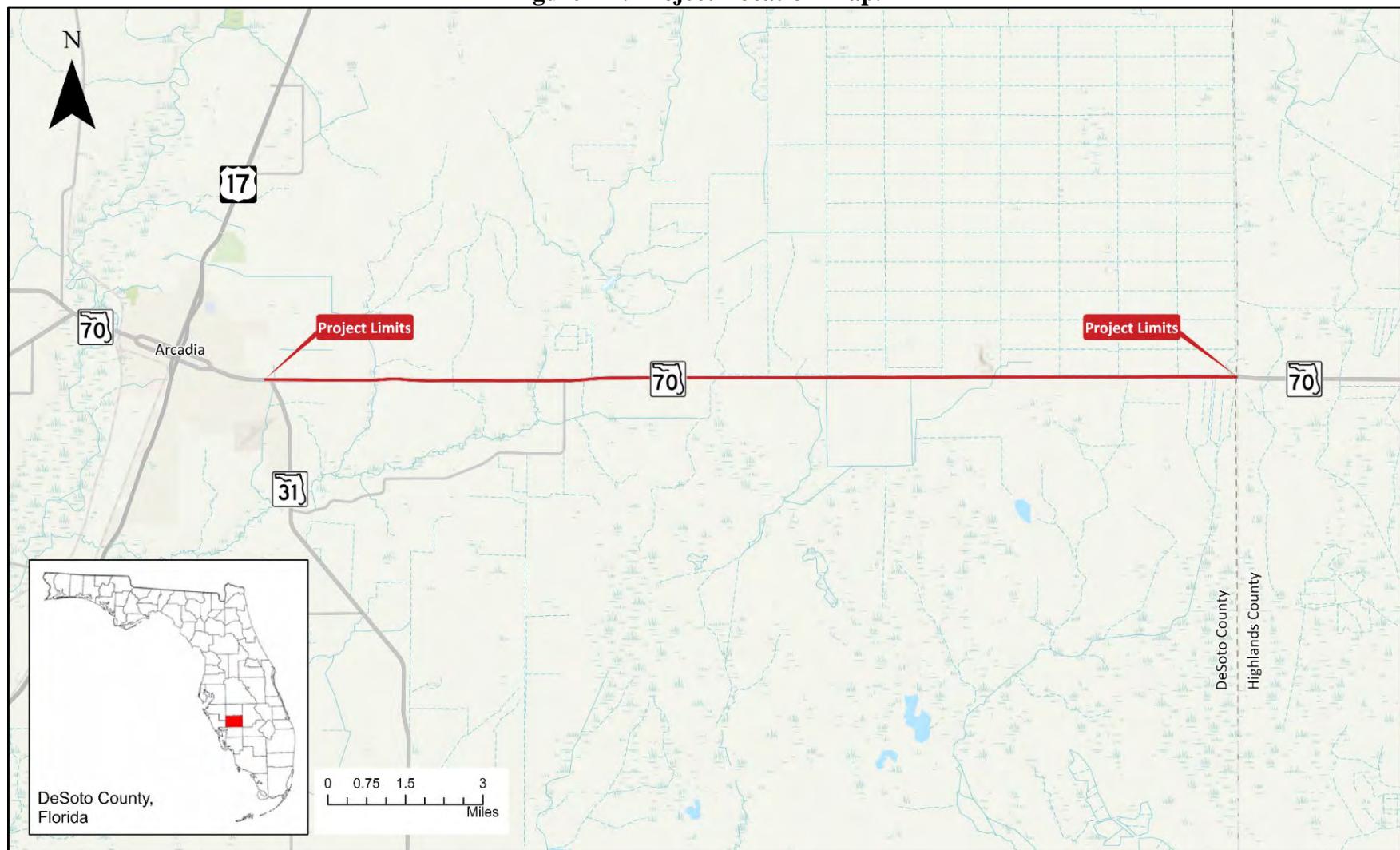
This project has been evaluated for its potential effects on various social, cultural, natural, and physical resources. In addition to resource-specific technical reports produced for this study, the project was evaluated through FDOT's Efficient Transportation Decision Making (ETDM) process as project #14569.

Upon completion, this study will meet all requirements of the National Environmental Policy Act of 1969 (NEPA) as administered for the FDOT by the FDOT Office of Environmental Management (OEM) and the requirements of other federal and state laws to qualify the proposed project for federal-aid funding.

The Area of Potential Effects (APE) for archaeology consists of the existing right-of-way (ROW) containing the improvements and the APE for historic resources consists of the existing ROW and adjacent parcels up to 200 feet (ft) (61 meters [m]). PaleoWest, LLC dba Chronicle Heritage (Chronicle Heritage) completed a Phase I Cultural Resource Assessment Survey (CRAS) for the APE under separate cover (DeGregory et al. 2025). During the CRAS, Chronicle Heritage identified previously recorded resource 8DE00828 (Old SR 18/Mahon Avenue) within the APE. SHPO determined 8DE00828 eligible for the NRHP on May 12, 2009.

The purpose of the Case Study Report is to: 1) summarize FDOT's efforts to develop project alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects; 2) to evaluate the effects of the project on historic properties within the APE; 3) to propose potential mitigation measures to resolve adverse effects; and 4) to summarize public coordination efforts to date. These efforts have been conducted pursuant to 36 Code of Federal Regulations (CFR) Part 800.

Figure 1-1. Project Location Map.



1.2 Purpose and Need

The purpose of this project is to address roadway and traffic safety conditions on SR 70 from west of SR 31 to SE Highlands County Line Road in unincorporated DeSoto County. Other goals of the project are to maintain important east-west connectivity within the regional transportation network and accommodate freight activity within the area.

1.3 Existing Facility

SR 70 is part of Florida's Strategic Intermodal System (SIS) highway network and designated state hurricane evacuation route network. As part of the National Highway System, SR 70 is critical in the transportation network as it facilitates local and regional traffic and the movement of goods/freight. SR 70 is functionally classified as "Rural Principal Arterial – Other" within the project area, and the project segment of the roadway has an existing context classification of C2-Rural. The posted speed limit on the corridor is generally 60 miles per hour (mph) with slower speeds ranging from 40 mph to 55 mph west of SR 31 to west of Townsend Road.

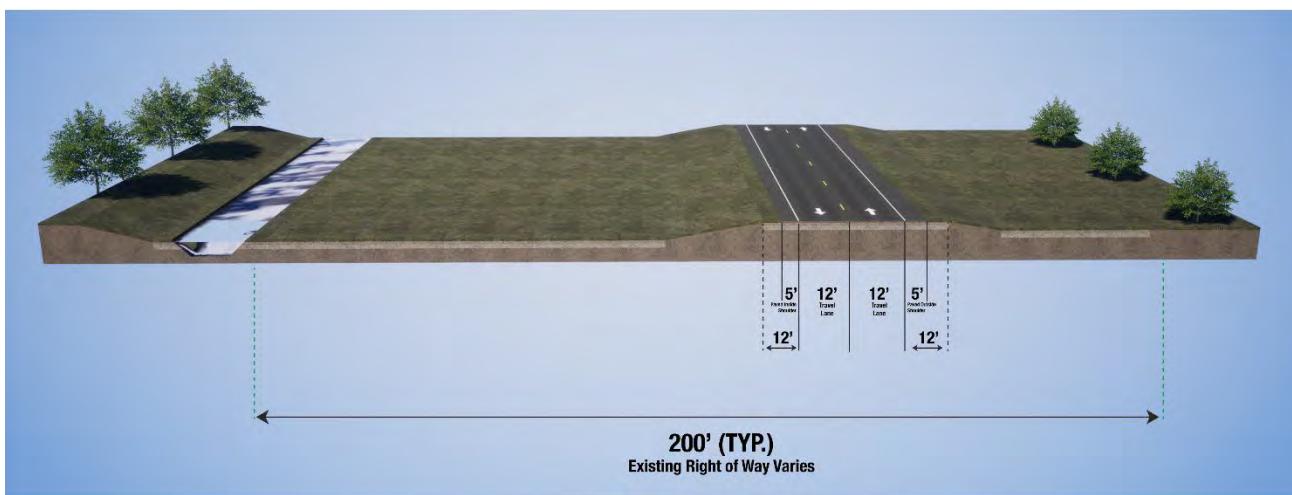
This segment of SR 70 consists of two existing roadway typical sections. From west of SR 31 to west of Townsend Road, SR 70 is a four-lane divided facility with 12-foot travel lanes and ten-foot outside shoulders (four feet paved). The travel lanes are separated by a raised grass median and intermittent right and left turn lanes. A portion of a ten-foot shared-use path is present on the northern side of the roadway, extending from west of SR 31 to west of Townsend Road (**Figure 1-2**). No designated bicycle lanes are present on either side of the facility.

Figure 1-2. Existing SR 70 Roadway Typical Section from west of SR 31 to west of Townsend Road.



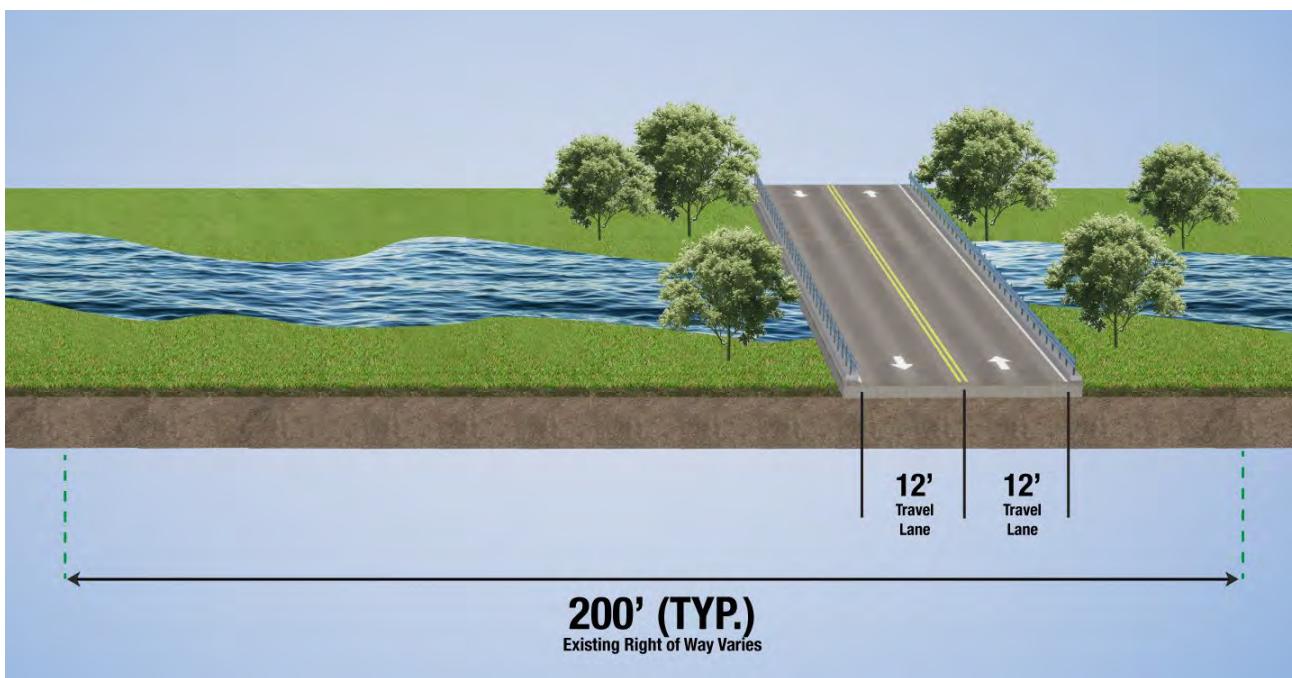
From west of Townsend Road to SE Highlands County Line Road, SR 70 becomes a two-lane undivided facility with 12-foot travel lanes and twelve-foot outside shoulders (five feet paved) (see **Figure 1-3**). The ten-foot shared use path from the previous four-lane section continues for a few thousand feet into this two-lane section from Townsend Rd to SE Townsend Ave.

Figure 1-3. Existing SR 70 Roadway Typical Section from west of Townsend Road to SE Highlands County Line Road.



The existing typical section for the SR 70 bridges over Whidden Creek (aka Mare Branch) and Joshua Creek consists of two 12-foot travel lanes with guardrail and traffic railings (**Figure 1-4**). There are no shared use path or designated bicycle facilities at these locations.

Figure 1-4. SR 70 Typical Section for Existing Bridges Over Whidden Creek and Joshua Creek.



Existing right-of-way (ROW) along the project portion of SR 70 is generally 200 feet in width, but ranges from approximately 180 feet to 220 feet in width from west of SR 31 to CR 760, and from 200 feet to 350 feet in width from CR 760 to SE Highlands County Line Road; it is generally wider to the north than south along the eastern end.

There are two bridges and five concrete bridge culverts along the corridor where lakes, streams, or wetlands intersect with the roadway. In addition, there are seven smaller concrete box culverts located along the project area. The two bridges and five concrete bridge culverts are as follows:

- SR 70 Concrete Bridge:
 - SR 70 over Whidden Creek (No. 040024)
 - SR 70 over Joshua Creek (No. 040027)
- SR 70 Concrete Bridge Culvert:
 - SR 70 over Tiger Bay (No. 040031)
 - SR 70 over Mossy Gully (No. 040032)
 - SR 70 over DCI Canal (No. 040033)
 - SR 70 over Long Point Marsh (No. 040037)
 - SR 70 over Parker Creek (No. 040940)

A full discussion of the existing roadway conditions can be found in the Preliminary Engineering Report (PER), prepared under separate cover.

Old SR 18/Mahon Avenue (8DE00828), the subject of this current case study, continues from west of NE Manley Road to east of CR 760, almost to NE Guynn Avenue. A typical section of SR 70 along this portion of the project is depicted in **Figure 1-3**. Note that 8DE00828 is not present across much of this portion of the project area and is not depicted.

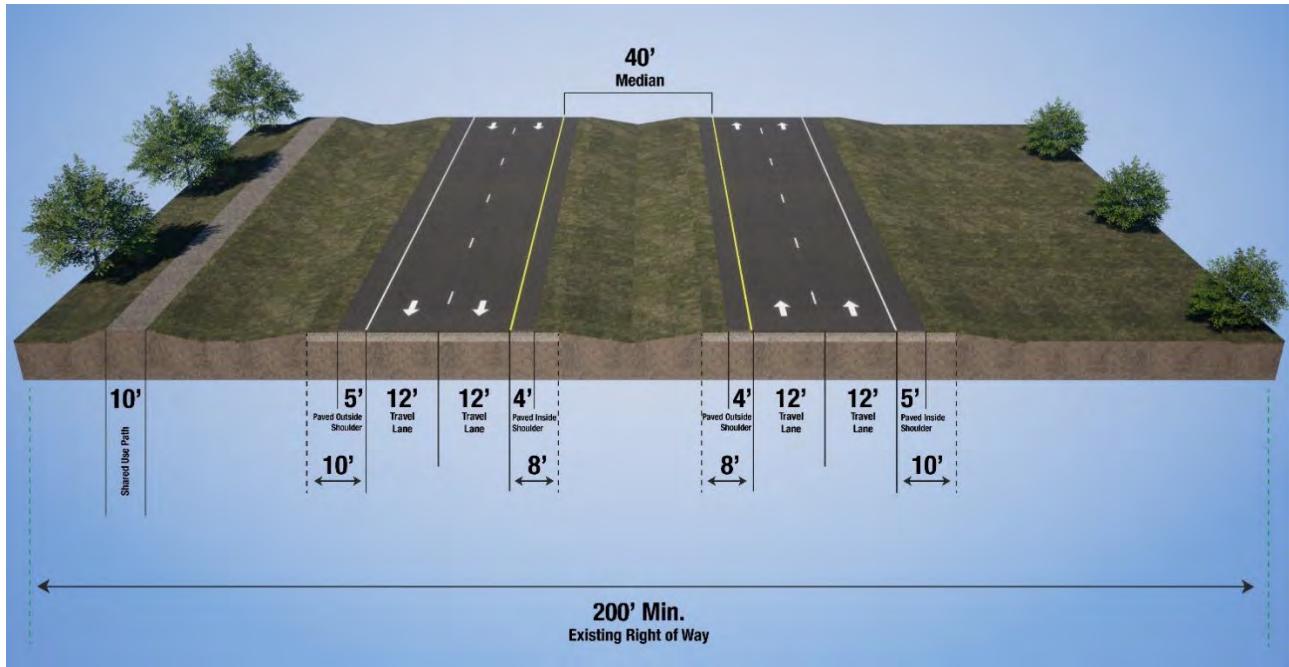
1.4 Proposed Improvements

To meet the Purpose and Need, the Preferred Alternative will widen SR 70 from two to four lanes throughout the study limits. The Preferred Alternative includes milling and resurfacing of portions of the existing roadway, along with construction of the westbound lanes to the north of the existing travel lanes.

From west of SR 31 to east of Siesta Boulevard, the Preferred Alternative will mill and resurface the existing roadway and shared use path, as consistent with **Figure 1-2**.

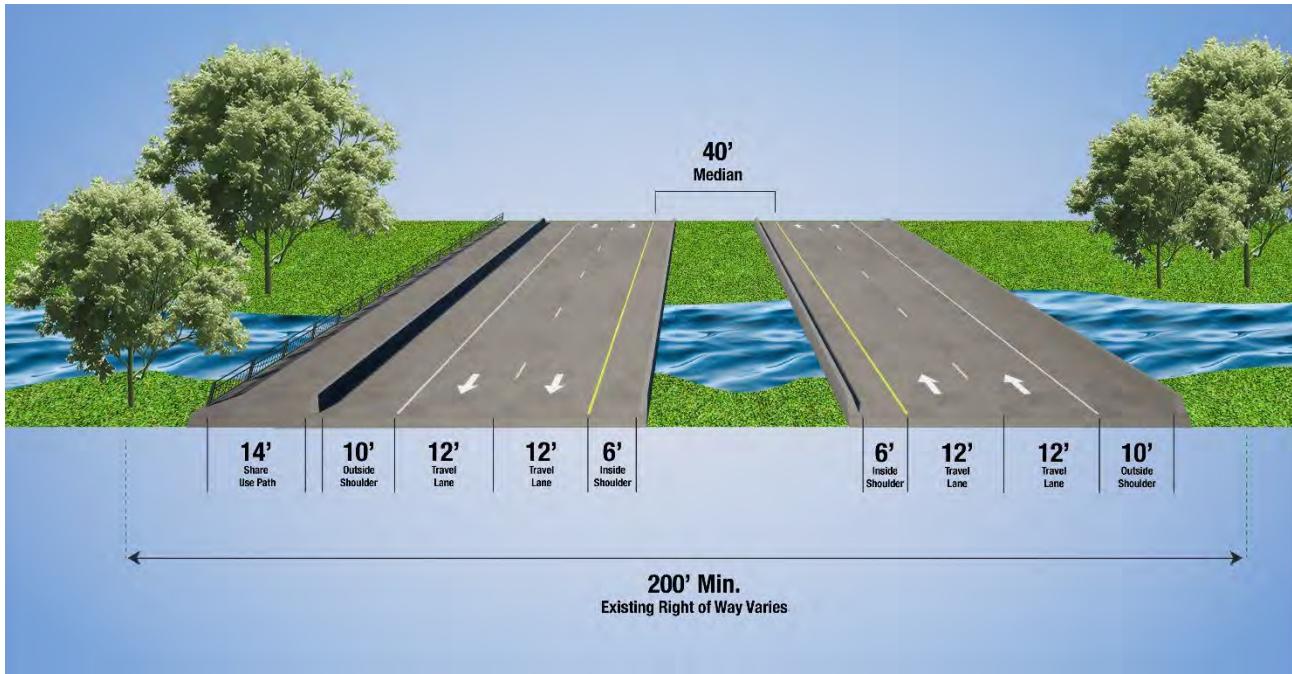
The Preferred Alternative from east of Siesta Boulevard to west of Joshua Creek (**Figure 1-5**) generally consists of four twelve-foot travel lanes, a forty-foot width median that includes eight-foot inside shoulders (four-foot paved), and ten-foot outside shoulders (five-foot paved). Improvements proposed within these limits will primarily consist of intermittent milling/resurfacing and widening/reconstruction of the existing lanes as the new eastbound lanes and widening/new construction of the new westbound lanes. A new ten-foot shared use path will be constructed adjacent to the current/historic alignment of Old SR 18/Mahon Avenue (8DE00828) and the northern right-of-way (ROW) line from the Toby's RV Resort entrance to approximately 1,200 feet west of Guynn Avenue (east of Joshua Creek).

Figure 1-5. SR 70 Preferred Alternative from west of SR 31 to west of Joshua Creek.



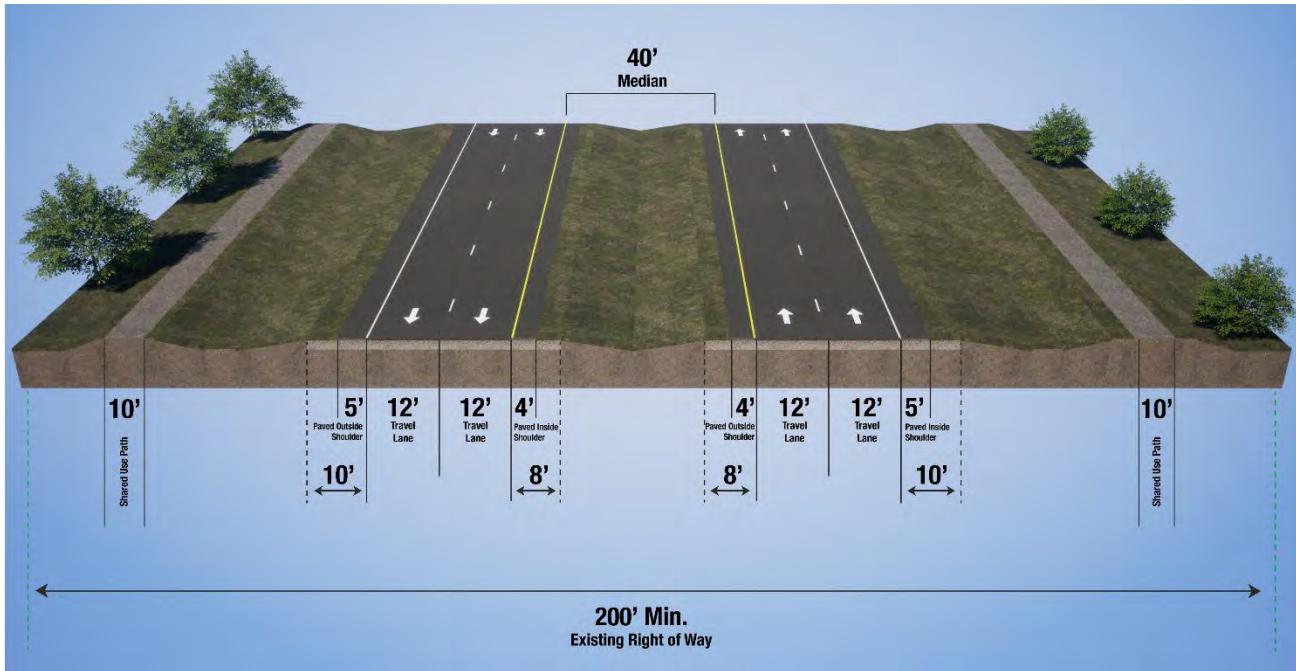
The Preferred Alternative for the bridges over Whidden Creek and Joshua Creek (**Figure 1-6**) include four twelve-foot travel lanes (two in each direction) with six-foot paved inside shoulders and ten-foot paved outside shoulders. Concrete barriers would be implemented on both shoulders. The westbound bridge will have a fourteen-foot shared use path with a concrete barrier separating pedestrian and bicycle users from the travel lane and a railing at the outside edge of the bridge. At Joshua Creek, two portions of shared use path will be constructed. A portion will be reconstructed adjacent to the current/historic alignment of Old SR 18/Mahon Avenue (8DE00828) along the north side of SR 70, ending approximately 1,200 feet west of Guynn Avenue. The second portion of shared use path will be constructed as a bicycle/pedestrian underpass under the reconstructed SR 70 bridges over Joshua Creek. From this location, the new shared use path will continue along the south side of SR 70 for the rest of the project length.

Figure 1-6. Preferred Alternative for SR 70 Bridges Over Whidden Creek and Joshua Creek.



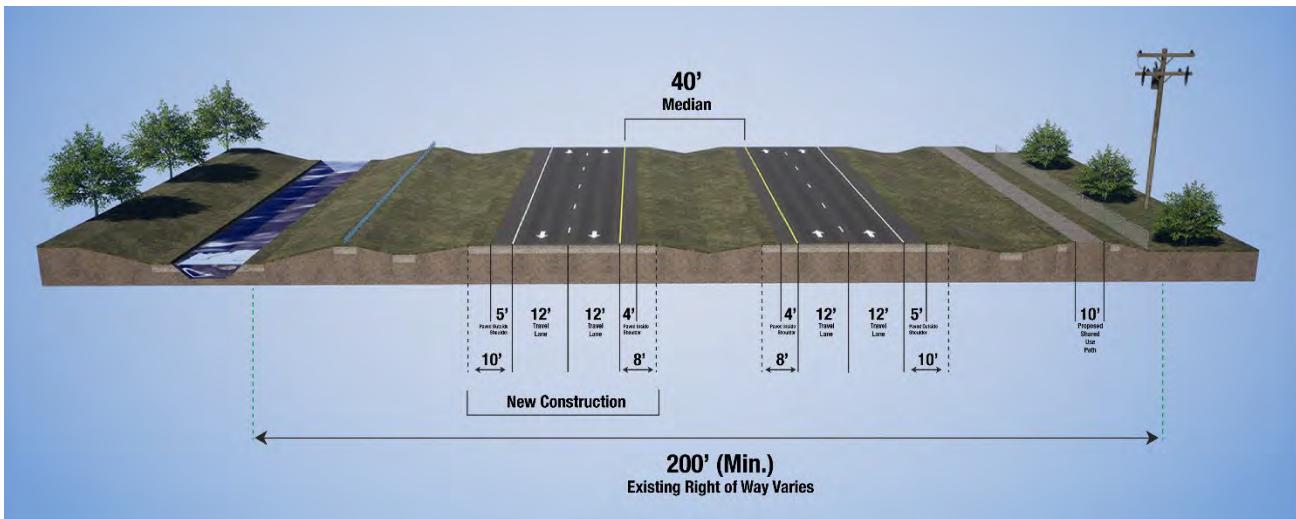
The Preferred Alternative east of Joshua Creek to CR 760 (Figure 1-7) features the construction of new westbound lanes to the north of the existing lanes, consisting of four twelve-foot travel lanes (two in each direction) with an open median of 40 feet that includes eight-foot inside shoulders (four-foot paved), and ten-foot outside shoulders (five-foot paved). Between Joshua Creek and CR 760 two new ten-foot shared use paths will be constructed adjacent to both the northern and southern ROW lines. Along the north side of SR 70, the shared use path will end opposite the CR 760 intersection, while the shared use path adjacent to the southern ROW line will continue eastward.

Figure 1-7. SR 70 Preferred Alternative from east of Joshua Creek to CR 760.



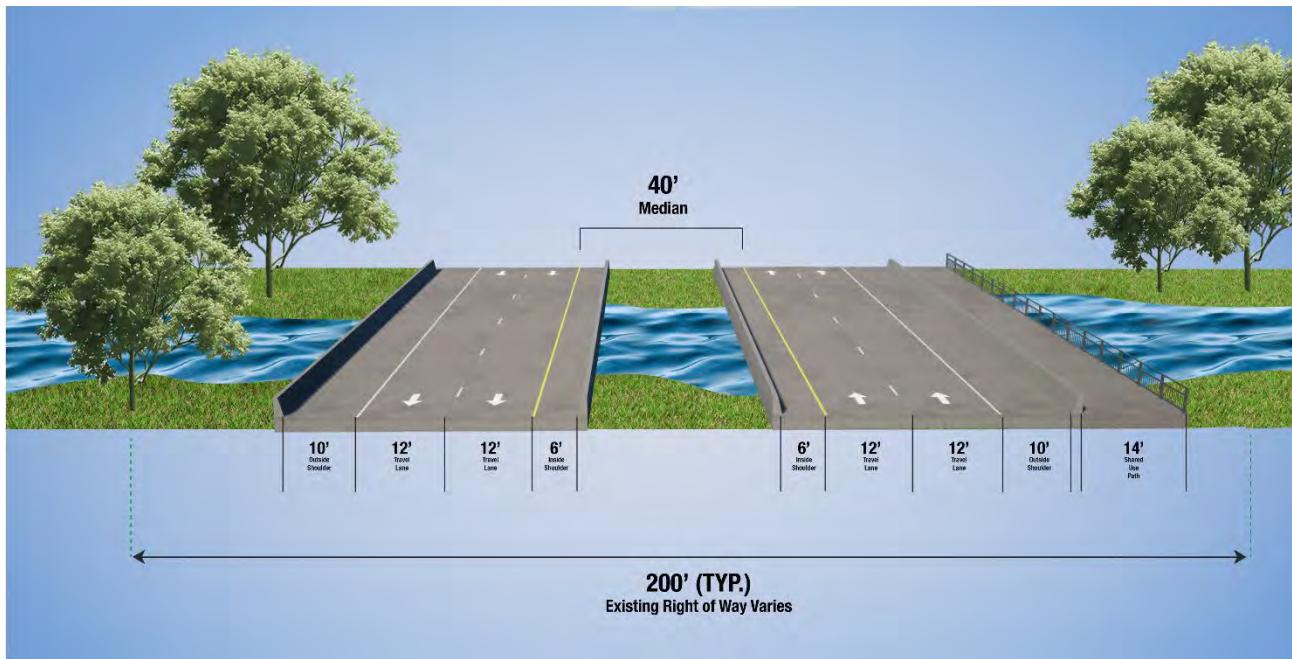
The Preferred Alternative from CR 760 to SE Highlands County Line Road (Figure 1-8) features the construction of new westbound lanes to the north of the existing lanes, consisting of four twelve-foot travel lanes (two in each direction) with an open median of 40 feet that includes eight-foot inside shoulders (four-foot paved) and ten-foot outside shoulders (five-foot paved). A guardrail will be constructed adjacent to the westbound lanes and existing canal.

Figure 1-8. SR 70 Preferred Alternative from CR 760 to SE Highlands County Line Road.



Between CR 760 and SE Highlands County Line Road, SR 70 has five additional bridge culvert crossings at Tiger Bay, Mossy Gully, DCI Canal, Long Point Marsh, and Parker Creek. The Preferred Alternative proposes new bridges (**Figure 1-9**) at each of these locations, including four twelve-foot travel lanes (two in each direction) with six-foot paved inside shoulders and ten-foot paved outside shoulders. Concrete barriers would be implemented on both shoulders. The eastbound bridge will have a fourteen-foot shared use path with a concrete barrier separating pedestrian and bicycle users from the travel lane and a railing at the outside edge of the bridge.

Figure 1-9. Preferred Alternative for SR 70 Bridges from CR 760 to SE Highlands County Line Road.



The project will include the construction of wildlife crossing features at the seven major bridge crossings, roadway signing and pavement markings, and stormwater management facilities including treatment ponds and floodplain compensation sites. The Concept Plans have been provided as **Appendix A**.

Old SR 18/Mahon Avenue (8DE00828), the subject of this current case study, falls within proposed typical sections depicted in **Figure 1-5** through **Figure 1-8**.

2 HISTORIC RESOURCE SUMMARY

Old SR 18/Mahon Avenue (8DE00828)

Resource Type: Resource Group

Build Date: circa 1918

Dimensions/Area: 4.85 mi (7.81 km)

Modifications: Brick overlaid with asphalt (unknown date); road downgraded from State Road (ca. 1978); western segment repurposed to multi-use path (ca. 2012)

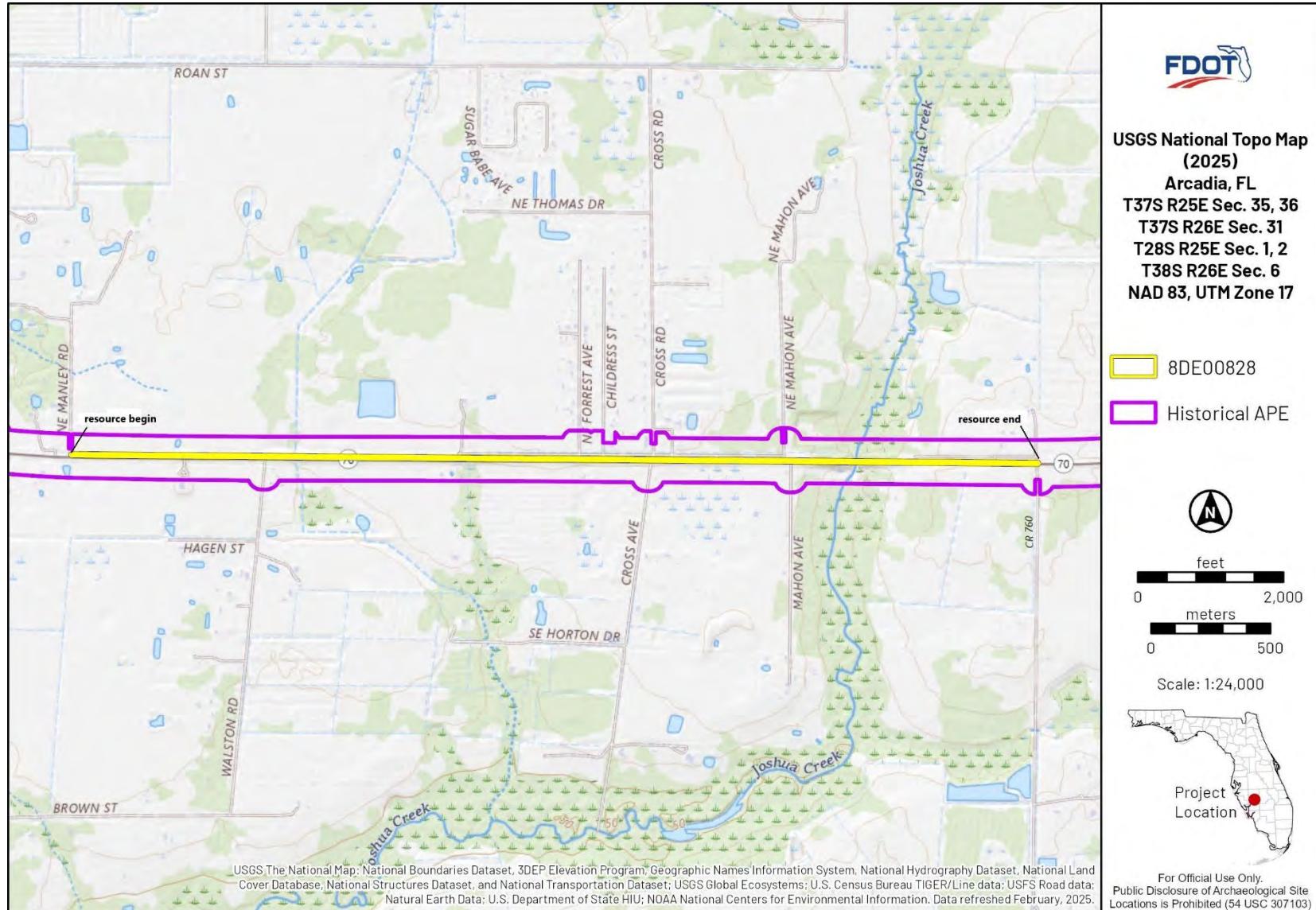
NRHP Eligibility Status: Eligible

Old SR 18/Mahon Avenue (8DE00828) has been evaluated as a significant historic resource due to its eligibility for listing in the National Register of Historic Places (NRHP) (Figure 2-1). This road is eligible for listing in the NRHP under Criterion A for Community Planning & Development and Transportation due its role as a supply route for historic Dorr Airfield (the current location of DeSoto County Correctional Facility) during World Wars I and II. It does not meet the requirements for Criterion B as it is not associated with a significant individual, nor does it satisfy the requirements for Criterion C as it is of common design. Criterion D does not apply as the resource itself offers no potential for further research.

For this study, SR 70/Mahon Avenue was evaluated for the role it played in local development. The First World War helped to stimulate the local economy, as two airfields—Carlstrom Field and Dorr Airfield—were established as flight training facilities by the U.S. Army Air Service in 1918 (Falgeau 1918). That year, a \$330,000 bond was issued to build a hard-surface road from Arcadia to Dorr Airfield which would also create a supply link as part of the Dixie Highway and would become SR 18 (Tampa Tribune, 8 March 1918:3). Dorr Airfield was constructed within DeSoto County's Big Prairie area. Originally used as grazing land for Arcadia's cattle industry, the broad, flat plain stretched 70 mi (112.7 km) long and 30 mi (48.3 km) wide. A military committee including Major Paul Ferron of the US Army and Captain A.J. Boyviven of the French Aviation Corps selected the area, which was approved on November 21, 1917. By the end of the year, the Atlantic Coast Railroad had completed rail lines to the developing site (Historic Property Associates, Inc. 1982).

By 1920, Arcadia was hailed as “Aviation City”. Dorr Airfield was the primary training site of the Southeast and served as the testing site for parachute innovations and guided missile experiments (Historic Property Associates, Inc. 1982). The aviation center was a boon for economic development of the area. By 1924, SR 18 crossed the state from Sarasota through Arcadia to Lake Anne (Chapin, News-Press, 18 December 1924:4).

Figure 2-1. Historical APE and NRHP-eligible portion of 8DE00828 on a topographic map.



During the 1920s, SR 18 was also known locally as Main Dixie Highway (Miami Herald, 13 February 1925:56). Dixie Highway was a major artery that facilitated the spread of Florida's building boom in the 1920s. Measuring approximately nine ft in width, SR 18 was originally constructed with brick pavers with expansions carried out with asphalt and gravel. SR 18 was renamed SR 70 by 1933 and also known as the Coast to Coast Highway. In 1959, construction began to realign the roadway to the current SR 70 alignment, leaving Mahon Avenue as the only original portion of SR 18 (Tampa Tribune 1959). On the 1978 (1980 ed.) Arcadia, Florida 15-minute topographic map, the Mahon Avenue was downgraded to a light duty road while SR 70 became the primary highway. Its local name, Mahon Avenue, is derived from the Mahon family, early settlers in Arcadia in the 1800s. Their descendants continue to own large portions of land along the remainder of Mahon Avenue (Hoffman and Tesar 2008). In 2011, a bid was posted to repurpose the original SR 18 route to a multi-use path (Port Charlotte Sun 2011). No documentation of SHPO consultation related to the conversion to a multi-use trail was recorded in the records of the Florida Master Site File (FMSF).

2.1 Resource Description

Old SR 18 (8DE00828) is a 4.85-mi (7.81-km) newly recorded segment of the previously recorded NRHP-eligible resource group. Within this 4.85-mi. length, approximately 2.8-mi of the resource had been previously evaluated and determined eligible for listing on the NRHP. The resource group is locally known as Mahon Avenue. Within the APE, the roadway is paved in areas and oriented east–west with a one-lane section that has low structural integrity on the western terminus of segment and throughout the eastern segment. Portions of original brick paving are visible intermittently along the route. In some segments of the roadway, only isolated patches of brick remain exposed. In other areas, larger, more continuous sections of brickwork are intact. Portions of the roadway are overgrown by vegetation. A mix of residential and agricultural lots bound the roadway to the north (**Figure 2-2** through **Figure 2-8**).

Surveyors recorded 8DE00828 (2.8-mi) in 2008, during Survey No. 16476 for the Florida Gas Transmission (FGT) expansion project, and recommended the resource was eligible for listing in the NRHP. SHPO concurred with this evaluation on May 12, 2009 (Hoffman and Tesar 2008). The SHPO noted that due to “its significance in the areas of Transportation and Community Development” the resource was eligible, and additional consultation would be needed if the project would impact the road. The NRHP-eligible limits of resource 8DE00828 can be seen on **Figure 2-1** and **Figure 2-9**. Following this 2008 survey and recordation of 8DE00828, no additional consultation with the SHPO is noted in the records of the FMSF. It does not appear that the planned conversion of the resource to a multi-use path in 2011 was the subject of any additional cultural resources evaluations or review by the SHPO. In 2025, Chronicle Heritage completed a survey which identified previously recorded resource 8DE00828 (Old SR 18/Mahon Avenue) within the APE and recommended the resource remain eligible for listing on the NRHP. The SHPO concurred with this evaluation on May 12, 2025 (DeGregory et al. 2025) (**Appendix B**).

Figure 2-2. Photograph of 8DE00828 – 1, facing east approximately 94 m east of NE Manley Road.



Figure 2-3. Photograph of 8DE00828 – 2, facing east, east of Mahon Avenue and NE Mahon Avenue (roughly 270 m west of CR 760).



Figure 2-4. Photograph of 8DE00828 – 3, facing east near the NE corner of Mahon Avenue and NE Mahon Avenue.



Figure 2-5. Photograph of 8DE00828 – 4, facing east from the NE corner of Mahon Avenue and NE Forrest Avenue.



Figure 2-6. Photograph of 8DE00828 – 5, facing east near the NE corner of Mahon Avenue and NE Childress Avenue.



Figure 2-7. Photograph of 8DE00828 – 6, facing west near the corner of Mahon Avenue and CR 760.



Figure 2-8. Photograph locations for Figures 3-2 to 3-7.

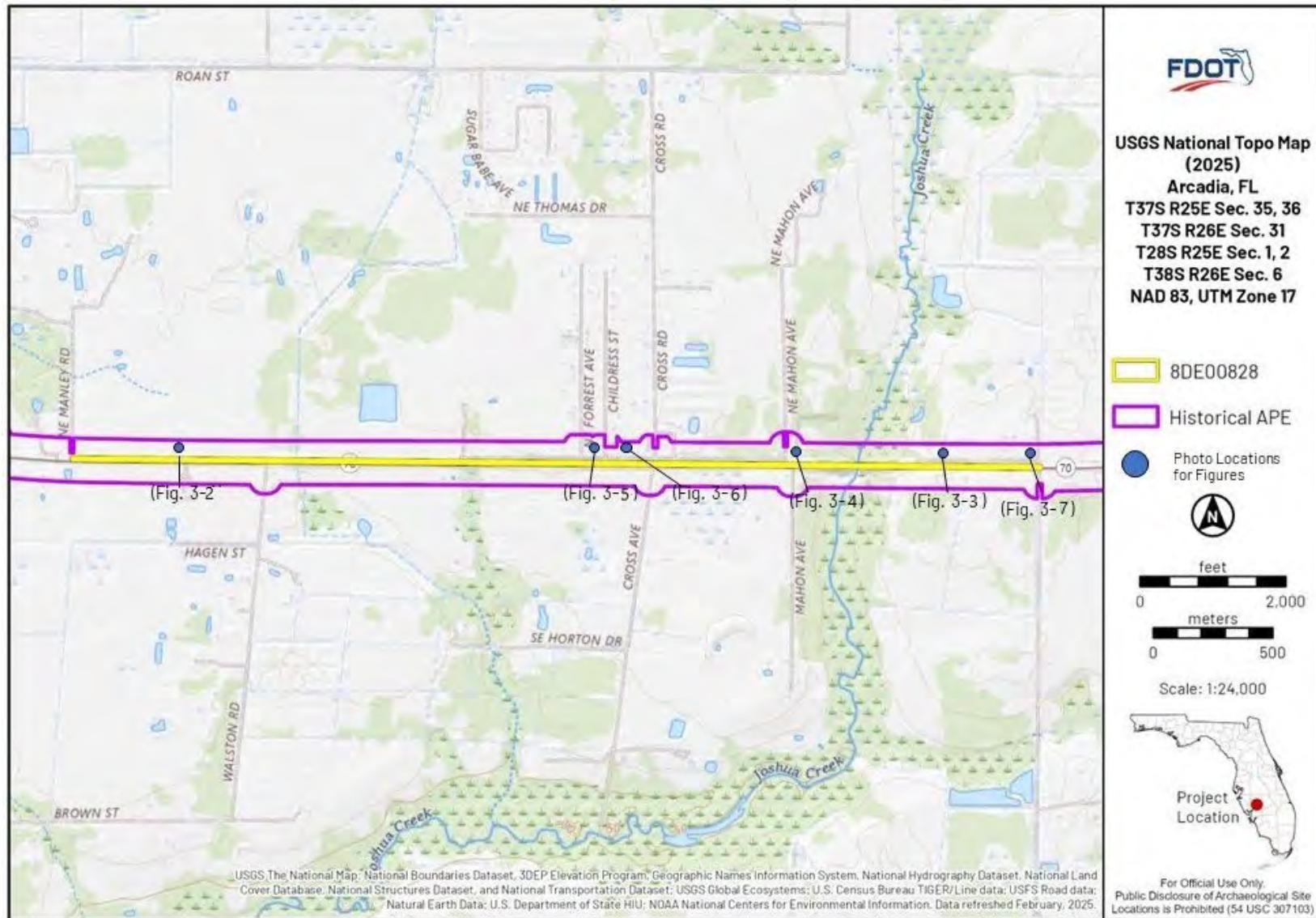
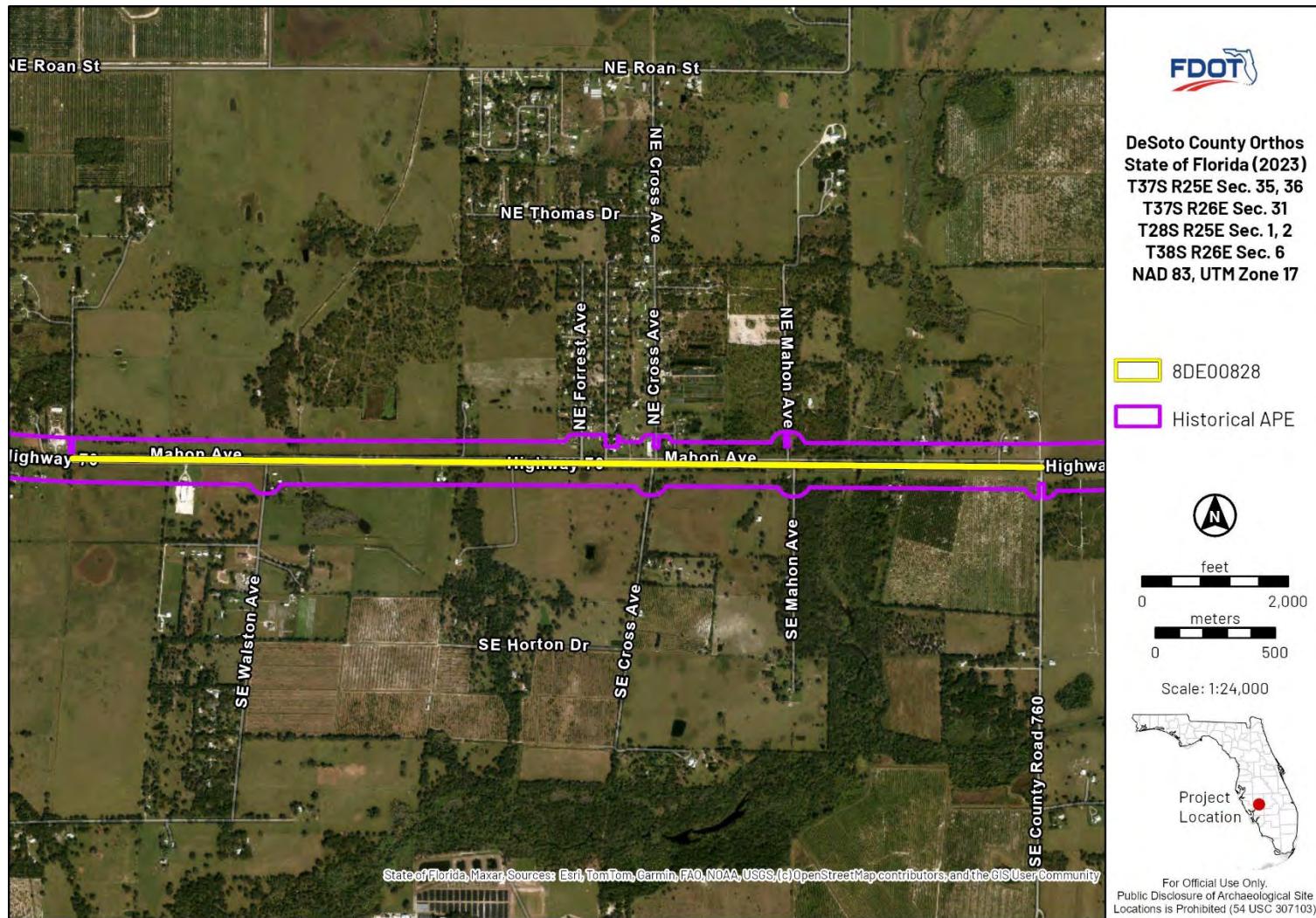


Figure 2-9. Historical APE and NRHP-eligible portion of 8DE00828 on an aerial image.



3 ANALYSIS OF PROJECT ALTERNATIVES

The proposed project includes the widening of SR 70 from two to four lanes, as well as the installation of safety features such as directional median openings (“bulb-outs”) which, combined with drainage features, will adversely impact 8DE00828 by removing it from the landscape and replacing portions of its route with modern materials to form a multi-use pathway.

The proposed undertaking involves the removal of SR 18/Mahon Avenue between NE Manley Rd. and CR 760 and its replacement with a new shared used path facility north of SR 70 from NE Manley Rd. approximately 2.8 mi (4.5 km) east to Joshua Creek, at which point the new shared use path will split into two portions, one along the north side of SR 70, ending approximately 1,200 feet west of Guynn Avenue, and the second being constructed as a bicycle/pedestrian underpass under the reconstructed SR 70 bridges over Joshua Creek and continuing along the south side of SR 70 for the rest of the project length. This report establishes that the action would constitute an adverse effect as defined in 36 CFR § 800.5. In accordance with 36 CFR § 800.6(a), FDOT has developed and evaluated alternatives or modifications to the undertaking that could avoid, minimize, or mitigate the adverse effect. The following project alternatives were considered: 1) No Action, 2) three Limited Development (two Avoidance and one Minimization) alternatives, and 3) the Build Alternative. Based on an evaluation of these alternatives, the Limited Development and Build Alternatives have been determined to meet the project’s stated purpose and need, while the No Action (No Build) alternative does not.

3.1 Alternative 1: No Action (No Build)

The project includes and evaluates the consideration of a No Action (No Build) Alternative, under which, no improvements beyond routine maintenance would occur. The No Action Alternative does not meet the Project’s Purpose and Need for the improvement of roadway and traffic safety. Increasing maintenance needed to maintain the functionality of SR 70, would also periodically impair east-west connectivity and freight mobility within the local and regional transportation networks. The No Action (No Build) Alternative precludes the development of much needed infrastructural improvements that increase safety for drivers and pedestrians. Additionally, the No Action (No Build) Alternative will result in neglect of the site; as described in 36 CFR § 800(a)(2)(vi) “neglect of a property which causes its deterioration” constitutes an adverse effect. As such, the No Action (No Build) Alternative is not recommended as it neither satisfies the project’s need nor avoids an adverse effect to Old SR 18/Mahon Avenue (8DE00828).

3.2 Alternative 2: Alignment Shift - Limited Development (Avoidance)

Avoidance Alternative 2 proposes a full alignment shift to the south, which would result in significant additional ROW acquisition and associated impacts. This shift would affect multiple parcels and critically impact FGT facilities, necessitating their relocation. Such utility relocation would introduce substantial costs and likely cause schedule delays due to complex coordination efforts. Importantly, this alternative introduces ROW impacts that are not present in the currently preferred mainline roadway alternative. The required ROW would accommodate not only the new SR 70 roadway footprint but also relocated utility corridors for both FGT and Florida Power and Light (FP&L). The expansion of the ROW would result in direct impacts to nearby residences, including multiple residential relocations, as well as additional loss of agricultural land and encroachments on the natural environment. As such, Alternative 2 is not recommended as it does not avoid an adverse effect to Old SR 18/Mahon Avenue (8DE00828), results in significant utility and environmental impacts, and is more impactive than other alternatives similarly evaluated.

3.3 Alternative 3: Reduced Median - Limited Development (Avoidance)

Avoidance Alternative 3 proposes a reduced median width featuring a double-faced guardrail configuration. This design would fit within the existing ROW and successfully avoid impacts to FGT facilities. However, it necessitates several design variations that diverge from standard FDOT criteria. These include a reduction in median width from the required 40 feet to a proposed 23 feet, as well as a decrease in base clearance from the standard three feet to one and two feet, respectively. Additionally, the proposed design may require a variation to the allowable slope break between travel lanes and turn lanes, in order to accommodate median openings and provide access to side streets and driveways; current criteria stipulate a maximum shoulder cross slope of seven percent.

This alternative also presents several roadway safety and constructability concerns. The proposed profile would need to be approximately one foot lower than the existing profile in certain segments to minimize the construction footprint—particularly the tie-ins—thereby avoiding disturbance to the historic alignment. In areas with significant grade separation, it may be necessary to reconstruct the existing SR 70 to lower the eastbound lanes or install grade-separated walls within the median. Moreover, this alternative would restrict U-turn movements and limit the space required for bulb-outs, making it impossible to accommodate the WB-62 FL design vehicle. The changes would also impact a total of 14 access points on the north side of SR 70, including eight private driveways and six side streets—Manley Road, NE Forrest Avenue, Childress Avenue, NE Cross Avenue, Mahon Avenue, and CR 760.

Despite attempts to mitigate impacts, the design under this alternative would still encroach within one foot of the historic resource, making avoidance unlikely to be feasible during construction. As a result, this option is not recommended due to its numerous roadway safety risks, geometric constraints, and compromised functionality of essential turning movements.

3.4 Alternative 4: Relocated Drainage - Limited Development (Minimization)

Minimization Alternative 3 maintains a full-width median while relocating the drainage ditch to the north side of Old SR 18/Mahon Avenue. This alternative is not recommended, as it would direct roadway runoff across the adjacent trail, potentially leading to erosion and detrimental effects on the existing path infrastructure. In addition to anticipated constructability challenges, the design fails to meet FDOT safety standards for a shared-use path facility. Consequently, this alternative does not offer a viable solution.

3.5 Alternative 5: Build Alternative

Alternatives 1-4 are not recommended, as none of them both satisfies the project's purpose and need and definitively avoids adverse effects to Old SR 18/Mahon Avenue (8DE00828). Although Alternative 5 (Build Alternative) also requires demolition of SR 18/Mahon Avenue (8DE00828) linear path feature, this alternative maximizes roadway safety and opportunities for the enhancement of safety for bicycle and pedestrian users through providing connected facilities that minimize potential conflicts with vehicle traffic on SR 70. Alternative 5 also limits the mainline SR 70 roadway improvements to the existing ROW, avoiding the need for costly and impactful ROW acquisition, except for off-site stormwater management ponds and floodplain compensation sites. These off-site facilities are required for all alternatives except for Alternative 1 (No Action). There is no feasible alternative to this demolition that meets the needs of the project. Alternative 5 (Build Alternative) will be pursued for advancement and presented as the project's Preferred Alternative at a future public hearing, anticipated to be held in early 2026.

4 EVALUATION OF EFFECTS

This Section 106 Effects Case Study Report documents the potential effects the Preferred Alternative will have on Old SR 18/Mahon Avenue (8DE00828) which is eligible for listing in the NRHP. Criteria of Adverse Effect, as defined in 36 CFR § 800.5(a)(1), were applied to the resource. An adverse effect is defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects on historic properties, found in 36 CFR § 800.5(a)(2), include but are not limited to:

- i. Physical destruction of or damage to all or part of the property;
- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- iii. Removal of the property from its historic location;
- iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v. Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The preferred alternative requires the demolition of Old SR 18/Mahon Avenue (8DE00828), and the project overall also will include the adverse effects listed in items i, ii, iv, and v. In accordance with 36 CFR § 800.5(a)(2)(i), the preferred alternative will have an adverse effect on 8DE00828.

8DE00828 meets Criterion A in the areas of Transportation and Community Planning and Development. 8DE00828 was constructed during the First World War era along with the

construction of Dorr Airfield east of Arcadia, for which it was a historic supply route. It was also part of the SR 70 “Coast to Coast Highway,” connecting the west coast of Florida to the east coast of the state. Its brick construction conveys the development of roads throughout the state. It does not meet Criterion B since there are no associations with significant persons. It is not eligible under Criterion C, as the existing historical materials are heavily damaged by traffic and lack of maintenance. 8DE00828 is not eligible under Criterion D, as it does not possess the potential to provide further information of historical importance.

8DE00828 retains a portion of its original alignment. Furthermore, the original materials from its construction as a brick road segment are still evident. Physical impacts to the resource from the proposed road construction project would include destruction or removal of the brick and other original construction materials for newly constructed roadway, shared use path and drainage improvements. However, the new path will closely follow the original alignment, so this feature will not be totally/functionally destroyed.

5 MITIGATION MEASURES

There are no feasible or reasonable means of avoiding demolition of 8DE00828 (Old SR 18/Mahon Avenue) while meeting the purpose and need of the project. Demolition will result in an adverse effect to 8DE00828, and in accordance with 36 CFR § 800.6(a), the following potential mitigation measures will be provided to resolve the adverse effect. Prior to initiating any ground disturbing or demolition work associated with the Project, FDOT shall ensure that the following measures are carried out:

I. Mitigation Measures

- A. A drone fly-through will be completed to visually document the resource prior to construction commencement.
- B. The project's conceptual design plans include the construction of a new 10-foot shared use path on the north side of the road in approximately the same area and following nearly the same alignment as the 8DE00828 (Old SR 18/Mahon Avenue) linear path. The project will reconstruct a 50-foot portion of the 8DE00828 (Old SR 18/Mahon Avenue) linear path in brick adjacent to the new shared use path replacement, including a bench and/or shade structure with an educational kiosk
- C. In conjunction with Measure I(B), an extended historical narrative will be prepared and submitted to the Division of Historical Resources and the DeSoto County Historical Society.
- D. An ESRI GIS StoryMap will be produced showing the historic road's original alignment to document how it served as a transportation route connecting the community and the Dorr Airfield during its period of significance.
- E. A Florida Historical Marker Program application will be completed and submitted.

These measures are neither exhaustive nor final; additional measures can be arrived at through consultation with SHPO, the public, and other potential consulting parties. Pursuant to Public Law 113-287 (Title 54 U.S.C.), FDOT will conduct a public hearing for this project before the end of 2025. FDOT will make the information presented in this Case Study Report available to the public and will provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking.

Finally, FDOT will execute a MOA with the SHPO pursuant to 36 CFR § 800.6(c) to document final mitigation measures.

6 CONSULTATION WITH THE PUBLIC AND THE ACHP

The Advisory Council on Historic Preservation (ACHP) is an independent United States federal agency charged with the mission to promote the preservation of the nation's diverse historic resources and will be notified of the finding of adverse effect as required by Section 800.6(a)(1). This request also invites the ACHP to be a consulting party to resolve adverse effects related to this project (Section 800.6(a)(1)(i)).

Pursuant to Public Law 113-287 (Title 54 U.S.C.), FDOT will conduct a public hearing for this project, FDOT will make the information presented in this Case Study Report available to the public and will provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. Public outreach to date can be found in **Appendix C**. The proposed improvements have not yet been made available for public review, but the public comment period will remain open throughout the development of the MOA, and all comments received will be taken into consideration in the development of the project.

7 CONCLUSIONS AND RECOMMENDATIONS

The FDOT, District One, is proposing to widen approximately 16.7 mi of SR 70 from west of SR 31 to SE Highlands County Line Road in unincorporated DeSoto County, Florida. The proposed action is to increase the capacity of the existing two-lane undivided roadway by widening it to a four-lane divided roadway, with the inclusion of safety and operational improvements as needed to accomplish the project Purpose and Need. The project will include the construction of wildlife crossing features, roadway signing and pavement markings, and stormwater management facilities including treatment ponds and floodplain compensation sites. The APE for archaeology consists of the existing ROW containing the improvements and the APE for historic resources consists of the existing ROW and adjacent parcels up to 200 ft (61 m).

Chronicle Heritage competed a Phase I CRAS for the APE under separate cover (de Gregory et al. 2025). During the CRAS, Chronicle Heritage identified previously recorded resource 8DE00828 (Old SR 18/Mahon Avenue) within the APE. SHPO determined 8DE00828 eligible for the NRHP on May 12, 2009. This CRAS is currently being updated for effects determinations for the respective resources.

The purpose of the Case Study Report is to: 1) summarize FDOT's efforts to develop project alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects; 2) to evaluate the effects of the project on historic properties within the APE; 3) to propose potential mitigation measures to resolve adverse effects; and 4) to summarize public coordination efforts to date. These efforts have been conducted pursuant to Public Law 113-287 (Title 54 U.S.C.).

The following project alternatives were considered: 1) No Action, 2) two Avoidance and one Minimization alternatives, and 3) the Build Alternative. FDOT reviewed several alternatives to avoid adverse impacts, including a southern full alignment shift. Such a shift would place the project in the path of utility infrastructure including FGT and FP&L lines. This avoidance alternative would also require the relocation of several residences along the southern SR 70 ROW.

Another avoidance alternative considered by FDOT reduced the size of the proposed median width, thus minimizing the footprint of the project and avoiding 8DE00828. This alternative would require the alteration of several safety elements of the project including grade separations and U-turn movement. This approach would still involve roadwork very close to the edge of 8DE00828 (less than 1 ft) and, as such, is unlikely to avoid an adverse effect.

A Minimization alternative was also considered with relocating drainage functions to the other side of the roadway, further complicating drainage issues and creating additional effects. As such,

none of the Avoidance Alternatives reviewed are recommended as they neither satisfy the project's need nor avoid an adverse effect to Old SR 18/Mahon Avenue (8DE00828).

Because the Build Alternative will cause demolition to approximately 2.8 miles (4.5 km) of Old SR 18/Mahon Avenue (8DE00828), which has been determined to be NRHP-eligible, FDOT has proposed mitigation measures to resolve the adverse effect. However, additional measures can be arrived at through consultation with FDOT, SHPO, the public, and other potential consulting parties.

Pursuant to 36 CFR §800.6(a)(4), FDOT will make the information presented in this Case Study Report available to the public and will provide an opportunity for members of the public to express their views on resolving adverse effects of the undertaking. Public comments will be accepted throughout the development of the MOA, and all comments received will be taken into consideration in the development of the project.

As avoidance of adverse effects is not possible, FDOT will advise the ACHP of the determination, and invite the ACHP to participate in the consultation process. Following the consultation period, a MOA will be developed and executed with SHPO pursuant to 36 CFR § 800.6(c) to document final mitigation measures.

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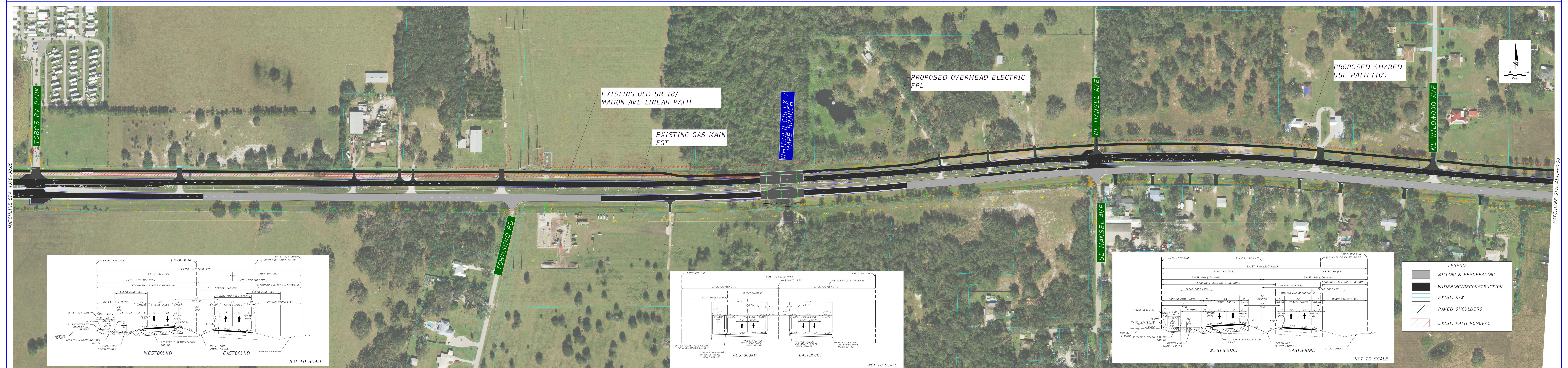
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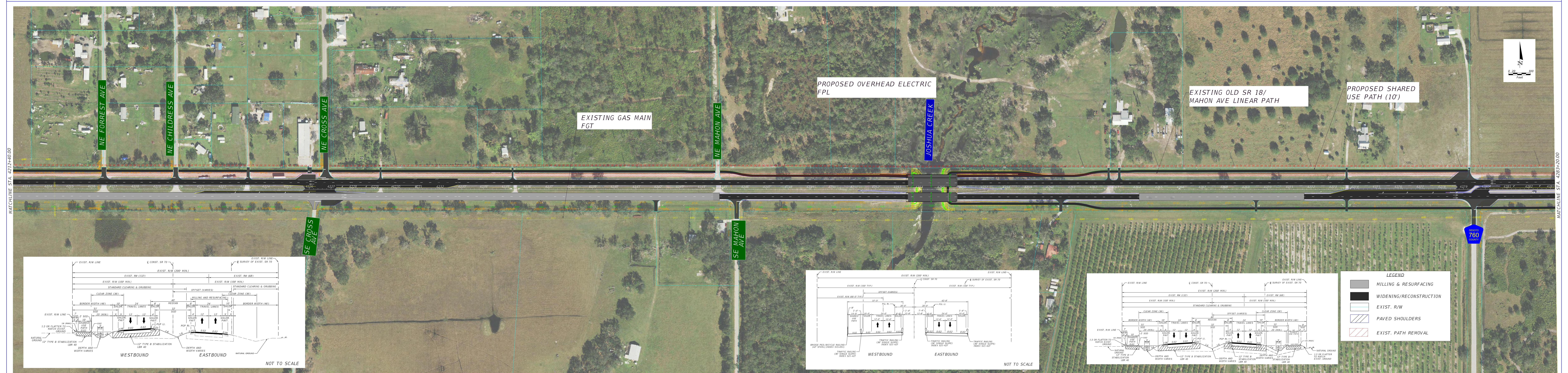
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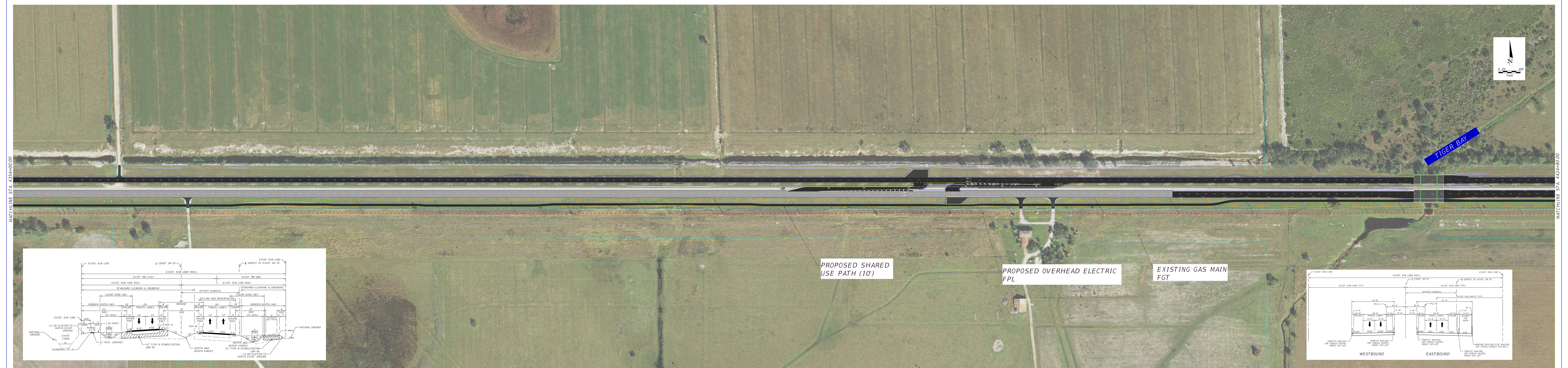
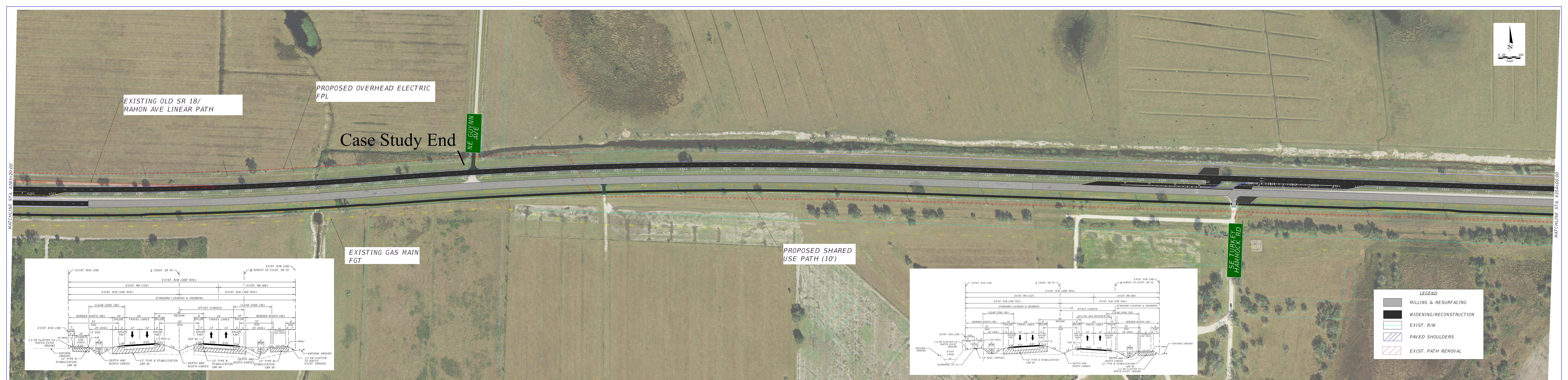
Appendix A.

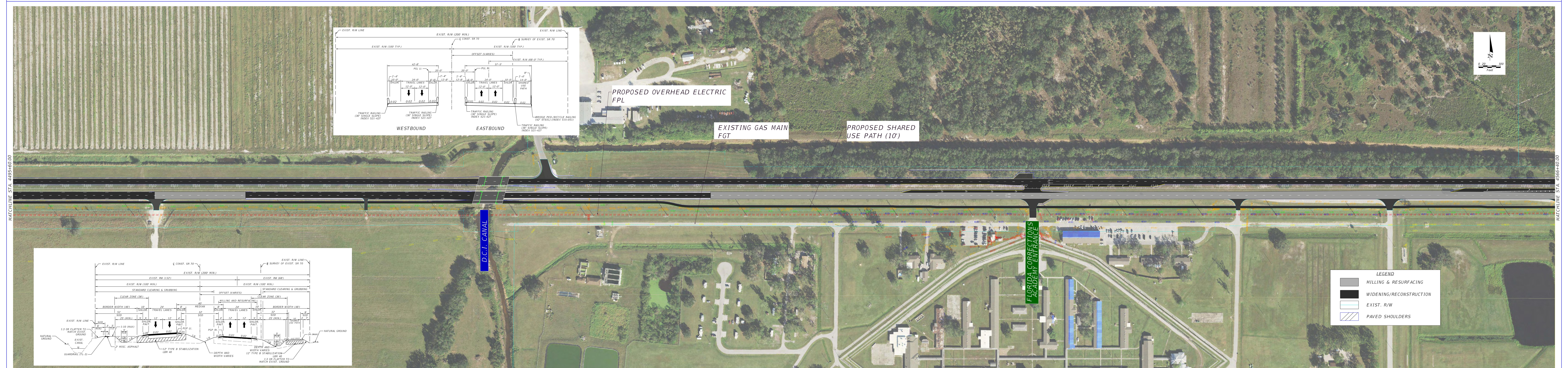
Preferred Alternative Conceptual

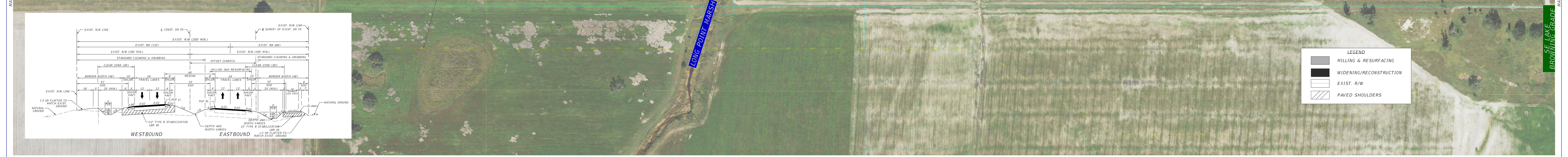
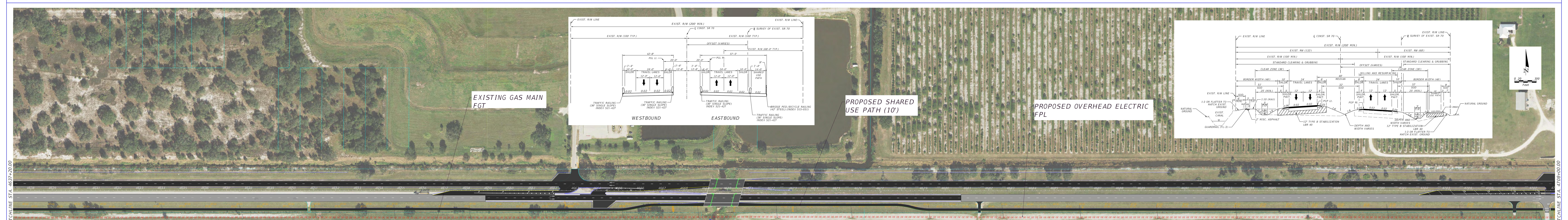
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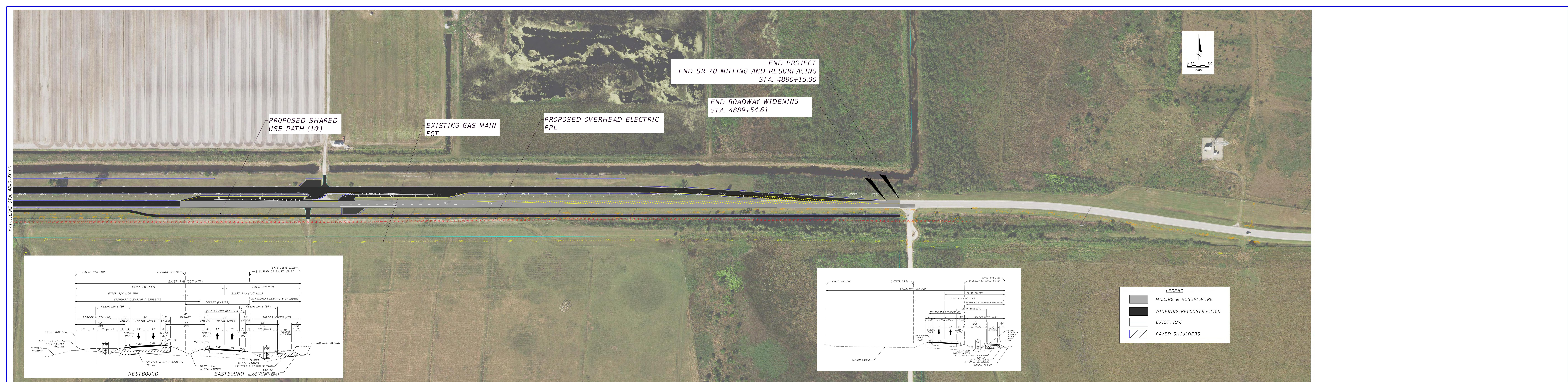












Appendix B.

SHPO Consultation Letter

April 10, 2025



Florida Department of Transportation

**RON DESANTIS
GOVERNOR**

605 Suwannee Street
Tallahassee, FL 32399-0450

**JARED W. PERDUE, P.E.
SECRETARY**

April 10, 2025

Alissa S. Lotane
Director and State Historic Preservation Officer
Florida Division of Historical Resources
Florida Department of State
R. A. Gray Building
500 South Bronough Street
Tallahassee, Florida 32399-0250

RE: Section 106 Stipulation VII Submission
SR 70 FROM W OF SR 31 TO SE HIGHLANDS COUNTY LINE ROAD
Desoto County
FM # 451942-1-21-01
DHR CRAT Number: 2025-2014

Dear Ms. Lotane,

Dear Ms. Lotane,

Enclosed please find the report of our cultural resource assessment survey for the proposed SR 70 PD&E Project in DeSoto County, Florida. I am submitting this report on behalf of our client, the Florida Department of Transportation District 1, for your review and comment. Professional archaeologists and architectural historians completed the work in November 2024 according to the Division of Historical Resources guidelines. Please find enclosed a report detailing the results and conclusions of our survey. It was performed in accordance with Section 106 of the National Historic Preservation Act and 36 CFR Part 800 as well as Chapter 267, F.S. and Rule 1A-46, F.A.C.

Our investigations identified two newly recorded archaeological sites (8DE01218 and 8DE01219), one newly recorded linear resource (8OSO3540), 22 newly recorded historic structures (8DE01192-8DE01213), four previously recorded resource groups (8DE00382, 8DE00828, 8DE00858, and 8DE01154/8HG01306), three previously recorded structures (8DE00829-8DE00831), and one previously recorded bridge (8DE00859). The historical bridge (8DE00859) is exempt from Section 106 Review and was not recorded as it meets the requirements of the *2012 Program Comment Issued for Streamlining Section 106 Review of Actions Affecting Post-1945 Concrete and Steel Bridges*. Additionally, one Archaeological Occurrence (AO) was documented as part of this survey.

The District recommends that there is insufficient information to make an NRHP determination for 8DE01218 and 8DE01219, as well as historical landscape 8DE00382, and linear resource 8DE01154/8HG01306. The District also recommends that 8DE00830, 8DE00858, 8DE01192-8DE01195, and 8DE01197-8DE01213 are individually ineligible for listing in the NRHP. Two previously recorded structures (8DE00829 and 8DE00831) were documented as being no longer extant. The AO consisted of single body sherd of sand-tempered plain pottery recovered from Stratum II at a depth of 25-40 cmbs and

no additional cultural materials were identified in bounding shovel tests resulting in the classification as an AO.

FDOT recommends that 8DE01196 (1058-1060 SE Hansel Avenue) is eligible for listing in the NRHP under Criterion A and B. 8DE01196 is eligible under Criterion A for its association to the Fenton Feeder innovation which had broad implications across the cattle industry, and Criterion B for its association to Carl Fenton, a leader in the agricultural industry as well as the local Arcadia community. 8DE00828 (Old SR 18/ Mahon Avenue) is a previously recorded linear resource built circa 1915 for which the boundaries were expanded by this survey. The District recommends 8DE00828 remains eligible for listing in the NRHP. 8DE00828 meets Criterion A in the areas of Transportation and Community Planning and Development.

Based on current plans, the project activities adjacent to 8DE01196 include milling and resurfacing and are consistent with current conditions. Therefore, proposed activities are not expected to diminish the character-defining qualities that may qualify this resource for inclusion in the NRHP. Proposed project activities adjacent to 8DE00828 consist of widening and reconstruction of SR 70 from two to four lanes. Also, SR 70 from just west of NE Manley Road to just east of CR 760 will require drainage improvements along the corridor. These activities may result in impacts to 8DE00828, and as such, a Section 106 Case Study will be completed to evaluate potential project effects to this and all historic properties identified during the study.

FDOT District 1 respectfully requests SHPO review of the CRAS survey and enclosed report, as well as concurrence on the NRHP evaluated presented therein.

If you have any questions, or if I can provide additional information, please don't hesitate to contact me at (863) 519.2625 or jeffrey.james@dot.state.fl.us.

Based on the review summarized above, FDOT has determined that this project 451942-1-21-01 requires additional documentation and coordination to make a determination of project effects. In accordance with Stipulation III.B. of the Section 106 Programmatic Agreement (PA), this review was conducted by or under the supervision of a person(s) meeting the *Secretary of the Interior's Professional Qualifications Standards* (36 C.F.R. Part 61, Appendix A and 48 FR 44716) in the fields of History, Archaeology, and Architectural History. 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 the FDOT pursuant to 23 U.S.C. § 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the FHWA and FDOT.

Sincerely,

Electronically signed by Emily Barnett **FOR** Jeffrey James on April 10, 2025

The Florida State Historic Preservation Officer (SHPO) reviewed the submission referenced above and finds the document contains sufficient information and concurs with the information provided for the above referenced project.

In accordance with the *Programmatic Agreement Among the FHWA, the FDOT, the ACHP, and the SHPO Regarding Implementation of the Federal-Aid Highway Program in Florida* (2023 PA), and appended materials, if providing concurrence with a finding of **No Historic Properties Affected** for a whole project, or to **No Adverse Effect** on a specific historic property, SHPO shall presume that FDOT may pursue a *de minimis* use of the affected historic property in accordance with Section 4(f) as set forth within 23 CFR. 774 and its implementing authorities, as amended, and that their concurrence as the official with jurisdiction (OWJ) over the historic property is granted.

SHPO/FDHR Comments



May 12, 2025

Signed

Date

Alissa S. Lotane, Director

Florida Division of Historical Resources

cc: Lindsay Rothrock, Cultural & Historical Resource Specialist
FDOT Office of Environmental Management

Submitted Documents

- [45194212101-TBD-D1-FMSF-2025-0306.zip](#) (Florida Master Site File Forms)
FMSF
- [45194212101-TBD-D1-451942-1_Demo_Letter-2025-0306.pdf](#) (Monitoring Report)
451942-1 Demo Letter
- [45194212101-TBD-D1-451942-1_CRAS_Report_FINAL-2025-0408.pdf](#) (Cultural Resources Assessment Survey (CRAS))
451942-1 CRAS Report_FINAL

Appendix C.

Project Kickoff Public Newsletter

SR 70 PD&E Study Kickoff

from west of SR 31 to SE Highlands County Line Road

FINANCIAL PROJECT IDENTIFICATION (FPID) NUMBER: 451942-1



Project Overview

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 DeSoto County. The intent is to improve traffic safety conditions on SR 70, maintain important east-west connectivity within the regional transportation network, and accommodate freight activity within the area. This study will evaluate the widening of SR 70 from a two-lane undivided roadway to a four-lane divided roadway, including operational improvements from west of SR 31 and SE Highlands County Line Road, extending 16.7 miles in length.

What is a PD&E Study?

A PD&E Study is the formal process of developing and comparing alternatives against a defined project purpose and need, to determine a preferred action that meets project goals while minimizing impacts on social, cultural, natural, and physical resources. Engaging the public by sharing and receiving information is a key component of this process and is required by the National Environmental Policy Act.

PROJECT GOALS

1

Improve Safety

2

Maintain Regional Connectivity

3

Accommodate Freight Activity



Barlow, FL 33830
801 North Broadway Avenue, MS 1-6
Florida Department of Transportation
Joe Lauk, P.E.
From West of SR 31 to SE Highlands County Line Road

SR 70 PD&E Study



What can you expect?

During the PD&E process, FDOT will evaluate the widening of SR 70 from two to four lanes from west of SR 31 to SE Highlands County Line Road, as well as a “no-build” alternative, which assumes no improvements to this segment of SR 70 other than routine maintenance. The study will evaluate any social and environmental impacts, safety enhancements, additional right-of-way needs, and traffic performance. You are encouraged to participate in this SR 70 PD&E study. We invite your questions and comments which can be submitted through the project website or by contacting the FDOT Project Manager. Following the development of a preferred alternative, a public hearing will also be held to provide interested persons the most current information on the project and allow an additional opportunity for public input. The public hearing meeting is anticipated to be held in the summer of 2025. Additional details will be provided as they become available.



CONTACT US

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Florida Department of Transportation
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Bartow, Florida 33830
Phone: (863) 519-2525
Email: joe.lauk@dot.state.fl.us
Website: www.swflroads.com/project/451942-1

Para información en español

Si usted necesita más información o tiene preguntas acerca de este proyecto, por favor comuníquese con la Sra. Karina Della-Sera con el Departamento de Transporte de la Florida (FDOT), por teléfono al (863) 519-2750 o enviando un correo electrónico a Karina.DellaSera@dot.state.fl.us.

También puede visitar la página web del proyecto: www.swflroads.com/project/451942-1.