



# TRANSPORTATION SYMPOSIUM

2019

## Cultural Resource Mitigation/Minimization in Transportation Projects: Best Practices

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# FDOT Environmental Organization

## **Office of Environmental Management**

- Sets policies and procedures
- Provides training
- Performs quality assurance
- Reviews/approves NEPA documents (Type 2 CE, EA, EIS)

## **District Environmental Offices**

- Project Development
- Environmental Evaluation
- Document preparation
- Project management
- Approves certain documents (Type 1 CE, SEIR, NMSA)



# NEPA Assignment (Dec 14, 2016)

- FDOT assumes FHWA's responsibility and liabilities for ensuring compliance with environmental review requirements
- FDOT through the OEM is responsible for review and approval of NEPA documents for highway projects in Florida (with some exceptions)
- FHWA no longer have any NEPA project level involvement
- FHWA's role is auditing the NEPA Assignment Program

## **Important note for cultural resources coordination:**

FHWA retains responsibility for Government-to-Government consultation with Native American Tribes

### Initiate [36 CFR § 800.3]

- Initiate the Section 106 Process

### Identify [36 CFR § 800.4]

- Identify Historic Properties

### Assess [36 CFR § 800.5]

- Assess Adverse Effects

### Resolve [36 CFR § 800.6]

- Resolve Adverse Effects

# The Section 106 Process [36 CFR Part 800]





Knight Estate, Green Cove  
Springs, demolished circa 2016

# So you have an adverse effect...

- Adverse effect- 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. 36 CFR § 800.5 (a)(1)
- Some examples per 36 CFR § 800.5 (a)(2)(i-vii)
  - Physical destruction
  - Alteration
  - Removal
  - Change of character of property's use
  - Introduction of visual, atmospheric or audible elements that diminish integrity
  - Neglect

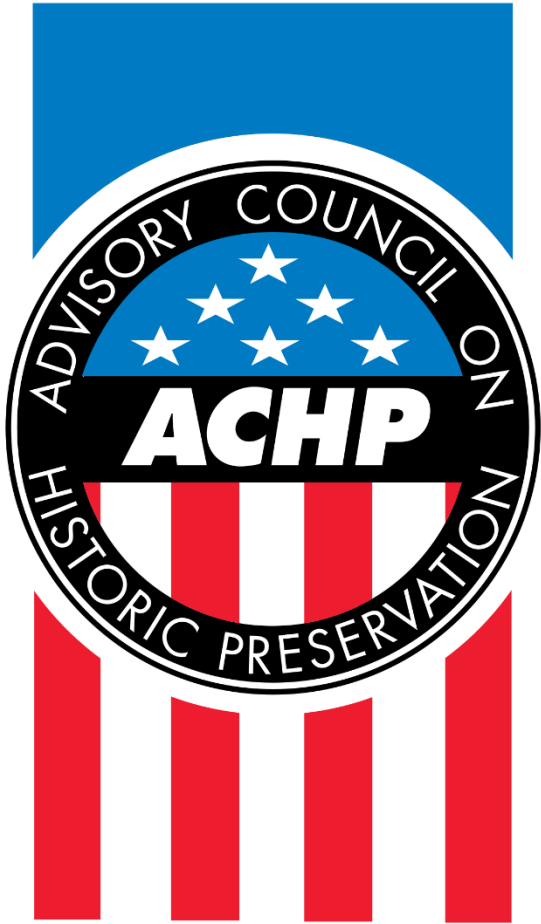


# Minimization and mitigation

- Minimization- minimizing the effect, reducing the impact of an effect
- Mitigation- a way to remedy or offset an adverse effect or change in a historic property's qualifying characteristics



Minimization: Trees added in Riverside Historic District, Jacksonville, to help preserve historic feel of canopy road



# Best Practices

- Be Proactive and Start Early
- Communicate and Consult
- Be Creative and Do the Right Thing
- Do the Legal Requirements
- Some good sources on best practices
  - <https://www.achp.gov/>  
Advisory Council on Historic Preservation
  - [https://www.fdot.gov/environment/Project Development and Environment Manual](https://www.fdot.gov/environment/Project%20Development%20and%20Environment%20Manual)
  - <https://dos.myflorida.com/historical/>  
Florida Division of Historical Resources



# Be Proactive

- Start early
  - The process helps- Cultural Resource Assessment Survey (CRAS) will help you identify problem areas
  - 30 day review for any document by SHPO
- Consider your alternatives in project development
  - The best mitigation is not causing an effect; even small alterations can avoid historic properties. Consider your project needs, can they still be met through avoidance?
  - Consideration of alternatives will come up in SHPO consultation
- Consult with your cultural resource professionals- individuals who meet Secretary of Interior's Professional Qualification Standards
  - FDOT Office of Environmental Management
  - FDOT District Cultural Resource Coordinators
  - Cultural Resource Consultants



Above: Smith Street Bridge, part of McCoy's Creek improvement project

Left: Archaeological shovel testing

# Communicate and Consult

- Consult with SHPO to develop your mitigation strategy
  - Present your ideas clearly, and keep an open mind
  - Consider face-to-face meetings or teleconference
- Reach out to stakeholders- how can you help protect or replace the value of the historic property?
  - Tribes
  - Local government
  - Historic organizations
  - Local Communities
- Public involvement is required under Section 106: 36 CFR § 800.6 (a)(4)





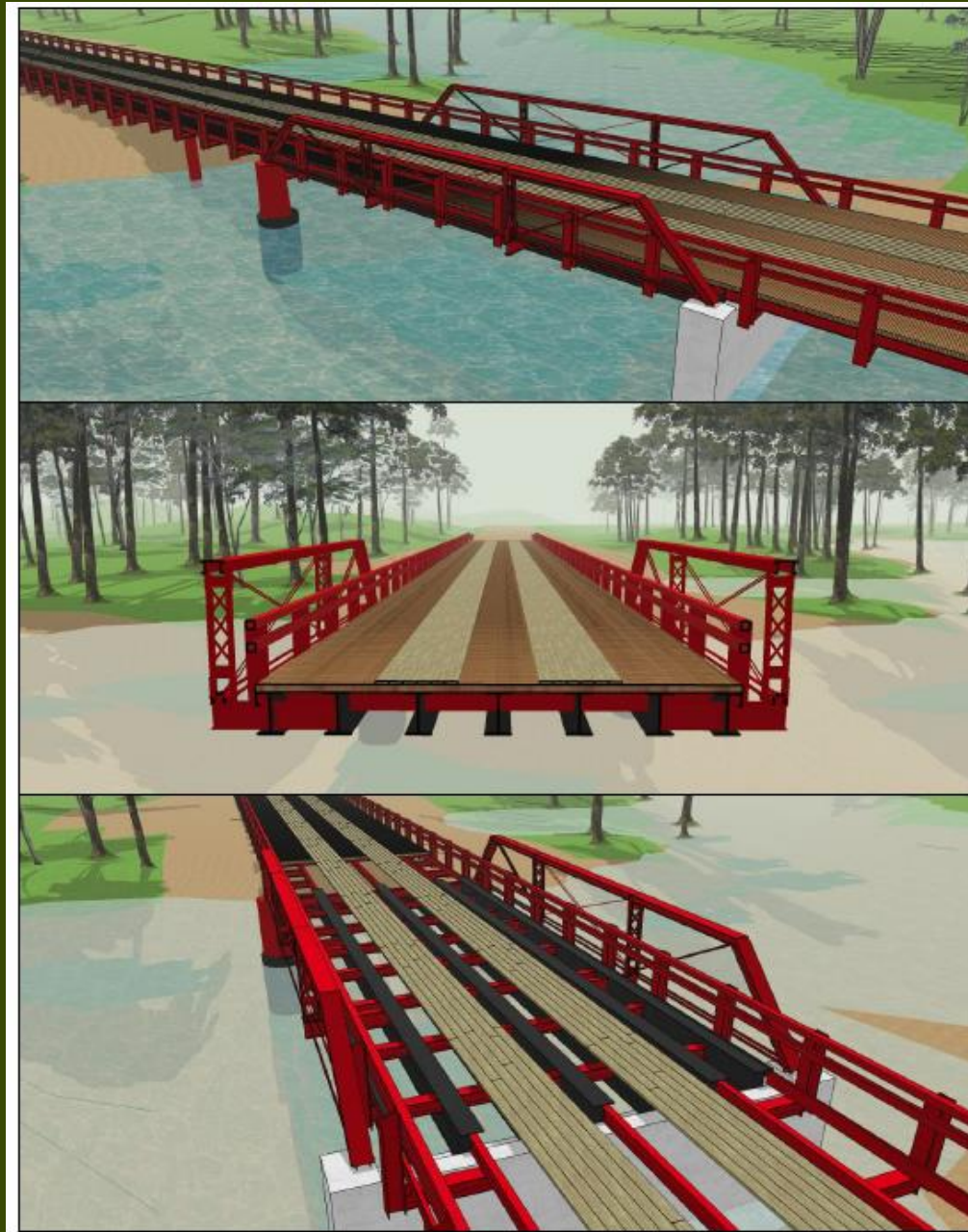
# Be Creative and Do the Right Thing

- Several standard mitigations exist
  - Recordation of property
  - Phase III Excavations of archaeological sites-data recovery
  - Historic Markers
- These mitigations will “cover the bases” but what value do they add?
- Think creatively- how can your mitigation give back?
- Why is the resource important to the community?



# Be Creative and Do the Right Thing!

- Creative mitigation solutions are encouraged
  - Interpretive signs that contextualize into larger history
  - Interpretive videos
  - Involving community organizations
  - Reuse of historic fabric in new interpretive context
  - Property relocation
  - New design incorporating historic elements into project
  - Resource protection such as covering sensitive sites with fill so they cannot be disturbed



SE Wolf Road Bridge- design concept incorporating original pony truss



August 4, 2016

**MEMORANDUM OF AGREEMENT  
BETWEEN THE FLORIDA DEPARTMENT OF TRANSPORTATION AND  
THE FLORIDA DIVISION OF HISTORICAL RESOURCES  
REGARDING ADVERSE EFFECTS TO  
THE MAIN STREET BRIDGE CULVERT (8DU07541) OVER HOGANS CREEK,  
IN THE CITY OF JACKSONVILLE, DUVAL COUNTY, FLORIDA**

**WHEREAS**, the Florida Department of Transportation (FDOT) is providing financial assistance for the emergency replacement of the Main Street Bridge Culvert (undertaking) (Financial Project I.D. No. 439601-1-21-01); and

**WHEREAS**, the undertaking consists of replacing the Main Street Bridge Culvert (Florida Master Site File [FMSF] Bridge Number 8DU07541) in the City of Jacksonville, Duval County, Florida; and

**WHEREAS**, the FDOT has defined the undertaking's area of potential effects (APE) as the existing bridge footprint and the area immediately adjacent to the bridge footprint; and

**WHEREAS**, FDOT has consulted with the Florida Division of Historical Resources (FDHR) pursuant to Chapter 267.061, Florida Statutes; and

**WHEREAS**, the FDHR has determined that the undertaking will have an adverse effect on 8DU07541, the Main Street Bridge Culvert, which is listed in the National Register of Historic Places (NRHP) as a contributing resource to the NHRP-listed Springfield Historic District (8DU02606), is partially located within the NRHP-eligible Confederate Park (8DU07543), is part of the NHRP-eligible Hogans Creek Beautification Project (8DU00203), and is physically connected to the contributing Hogans Creek Balustrade (8DU07529); and

**NOW, THEREFORE**, the FDOT and the FDHR agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

# Do the Legal Requirements

- All about documentation- if it isn't documented it didn't happen
- Memorandum of Agreement- required once agreement with SHPO is reached; MOAs are subject to legal review, so leave time for that
- Notify the ACHP of an adverse effect
  - E-submission
  - ACHP has 15 days to decide whether or not to be involved
- As part of MOA, continue to keep SHPO and OEM notified of your progress
  - Summary report at the end
  - Put reporting requirements/goals in your MOA





# Main Street Bridge Culvert Restoration

When you have to adapt your plan...



# Main Street Bridge Culvert Restoration

- Replacement of historic Main Street Bridge over Hogans Creek
  - Architect Henry J. Klutho Constructed as part of Hogans Creek Improvement Project in 1929
  - Ornamental features needed rehabilitation
- Communication and teamwork with all partners was key- bridge and road had to be closed due to structural deficiency, emergency project
- MOA executed August 4, 2016
  - 3D scanning of bridge elements
  - Restoration of bridge elements before replacement
  - Storage requirements
  - Site monitoring during construction
- Special provisions added to specifications to guide construction







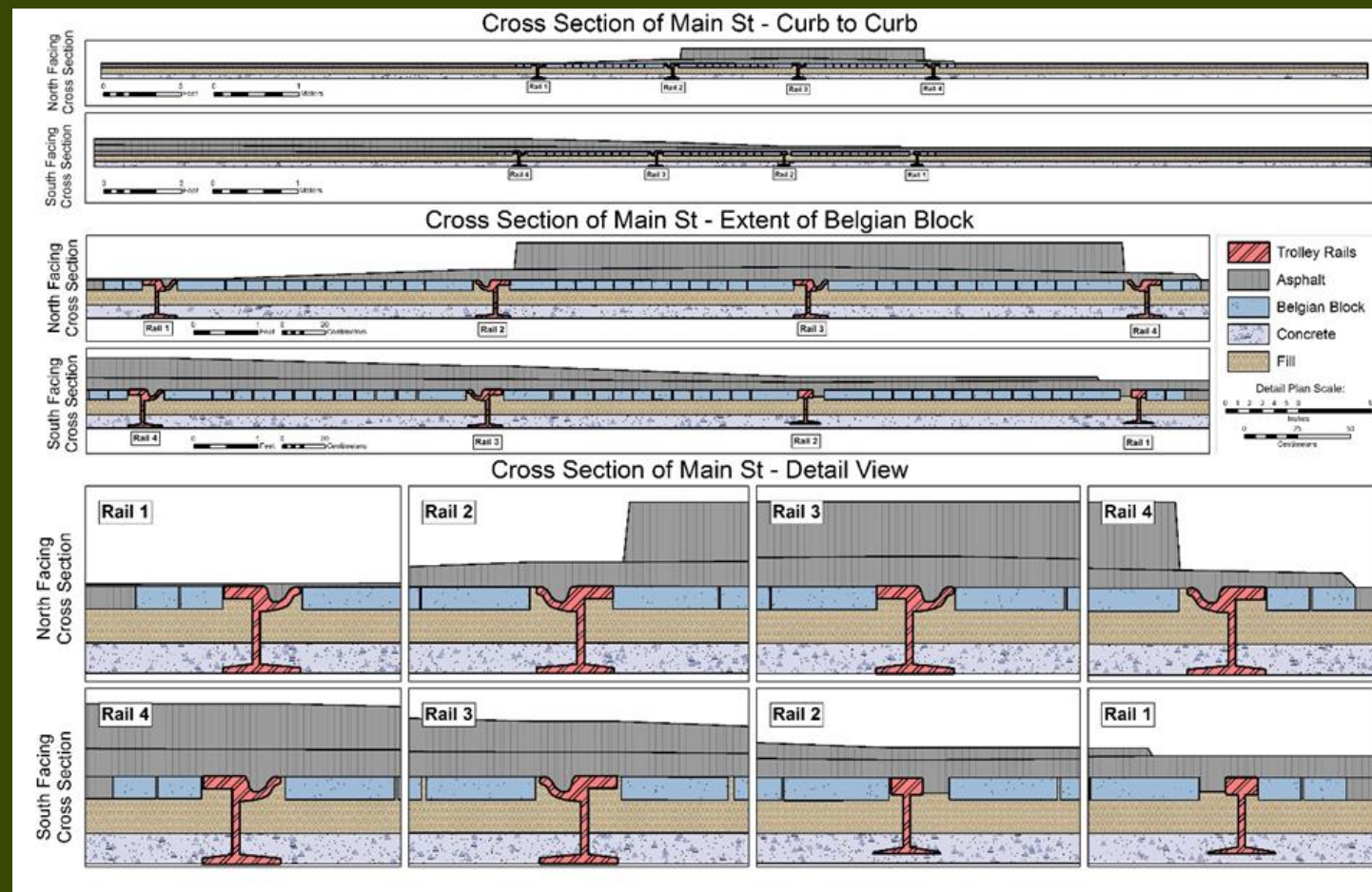
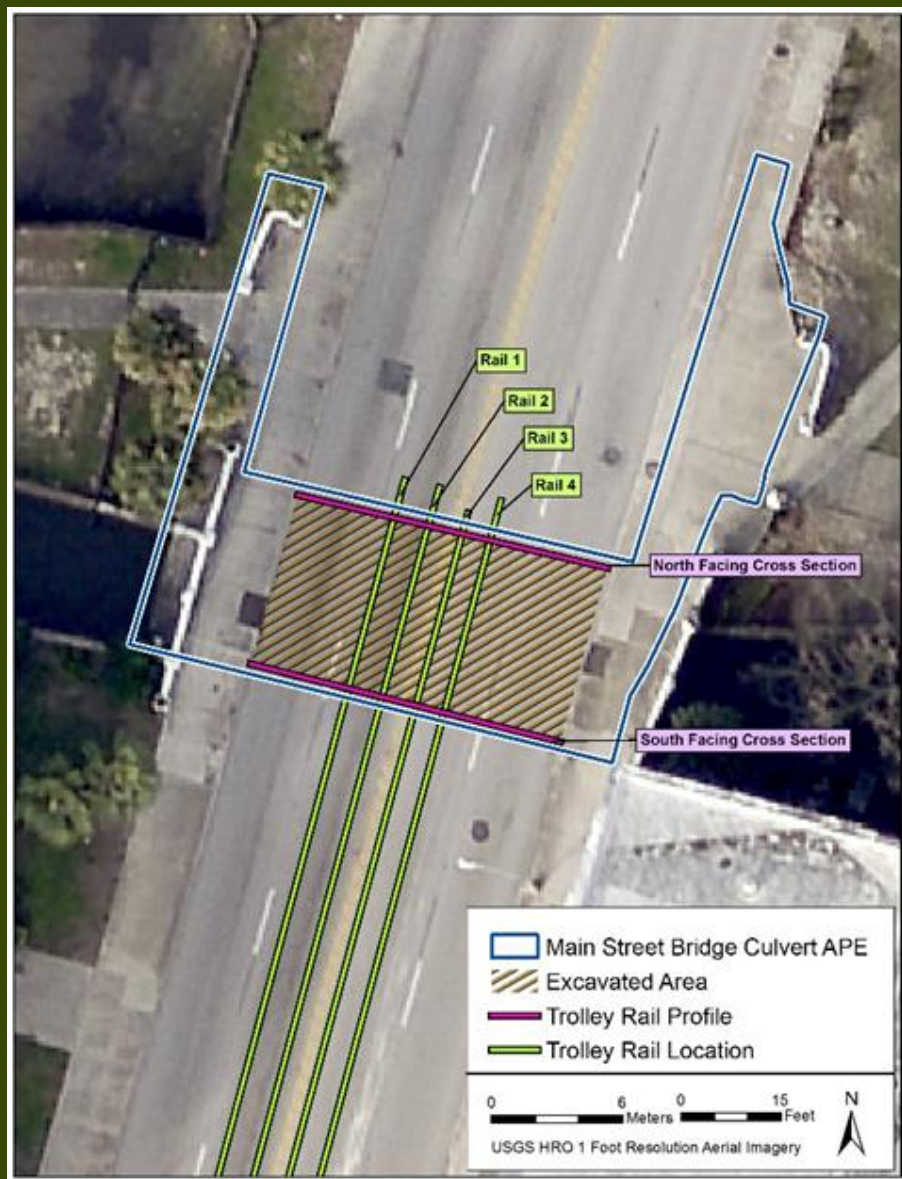
Original bridge signage  
recovered from Hogans Creek





Portions of original trolley line underneath  
road surface





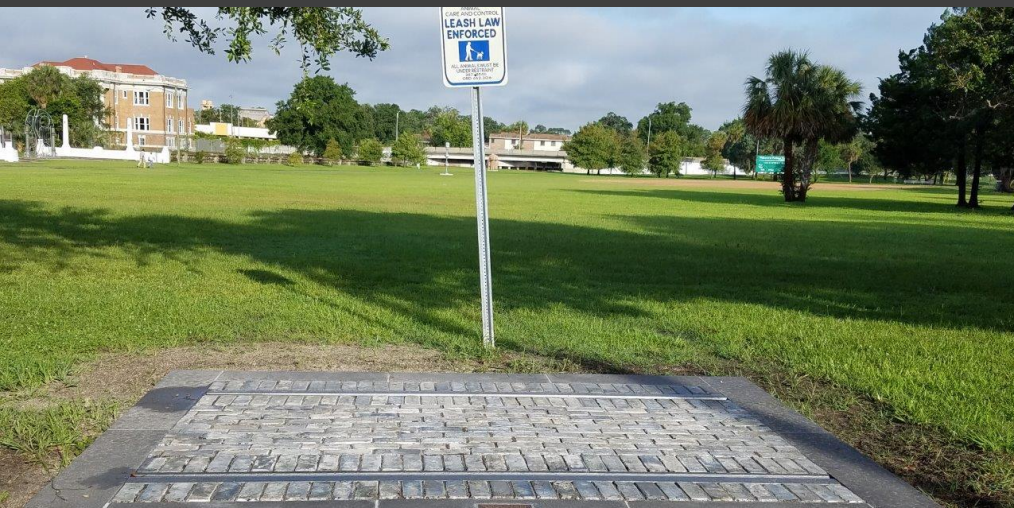






***Jacksonville Electric Company/ Jacksonville  
Traction Company Street Railway Tracks***

This reconstructed section of the Main Street trolley line (ca. 1906-1933) is built from original rails and pavers recovered in 2016 during emergency repairs to the Springfield Main Street Bridge spanning Hogans Creek. This section of the Jacksonville Electric Company's double track electric street car line was an upgrade from the original single track, mule-drawn trolley system (later electrified) that ran from downtown, up Main Street through Springfield, beginning in the early 1890s. Springfield Improvement Association and Archives volunteers carried out the salvage of these materials. We thank FDOT, ETM, Inc., SEARCH, Inc., and Jacksonville's Historic Preservation Section and Department of Parks, Recreation, and Community Services for making this exhibit possible. We are especially grateful to James Malefant (Precast and Restoration Services Inc.) for his design and to Craig Pedroni; their generous contributions of materials and labor helped Springfield Improvement Association and Archives fund the reconstruction of this important piece of Springfield's history at this location.



Original elements incorporated into  
interpretive display in Klutho Park by  
Springfield Improvement Association  
and Archives







# San Marco Historic Knee Wall Relocation, St Augustine, Florida

Creative solutions  
using original  
material





- Intersection of San Marco Avenue, W. San Carlos Avenue, and May Street
- Significant Traffic; Vehicles going over curb on tight turns (especially trailers)
- Unique “roundabout” solution proposed
- Intersection is within historic district and intersection improvement would impact historic knee wall at corner of W. San Carlos and San Marco





















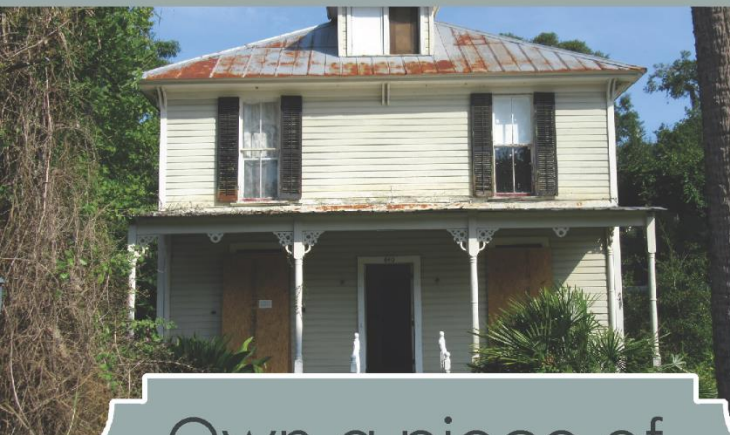




440 Atlantic  
Avenue,  
Interlachen,  
Florida  
Relocating the  
Past







## Own a piece of *History*

with your successful bid  
on this fixer upper at a new location!

This gorgeous two story home in the Folk Victorian style showcases ornate corbels on the front porch, tall baseboards, large windows, and original heart pine floors. Unique turn-of-the-century details can be found including lighting and hardware. Possibly constructed by George Hastings, this home is a true gem!

Year Built: c.1886 | 1880 sq ft | 4 BR 2 ½ BA

The FDOT will contract to move this house by a licensed/insured home mover to a new location within the area of historic homes of the City of Interlachen. Once reestablished, the property (including the land) will be offered for sale to the highest bidder. When the time comes, FDOT will provide a detailed bid package containing the specific terms and conditions for the bid and sale. The property will be conveyed subject to a specific legal covenant preserving the historic nature of the home.

- Widening of SR 20
- Adverse effect on several contributing historic structures to Interlachen Historic District
- 440 Atlantic Avenue (8PU1301)
  - Two story folk Victorian
  - Built circa 1886
- Memorandum of Agreement (executed November 8, 2011)
  - Relocation of 8PU1301
    - Archaeological assessment of relocation site
    - Documentation of existing structure
    - Security of property
    - Use of experienced historic mover
  - Marketing of 4 other historic structures



# Securing the structure



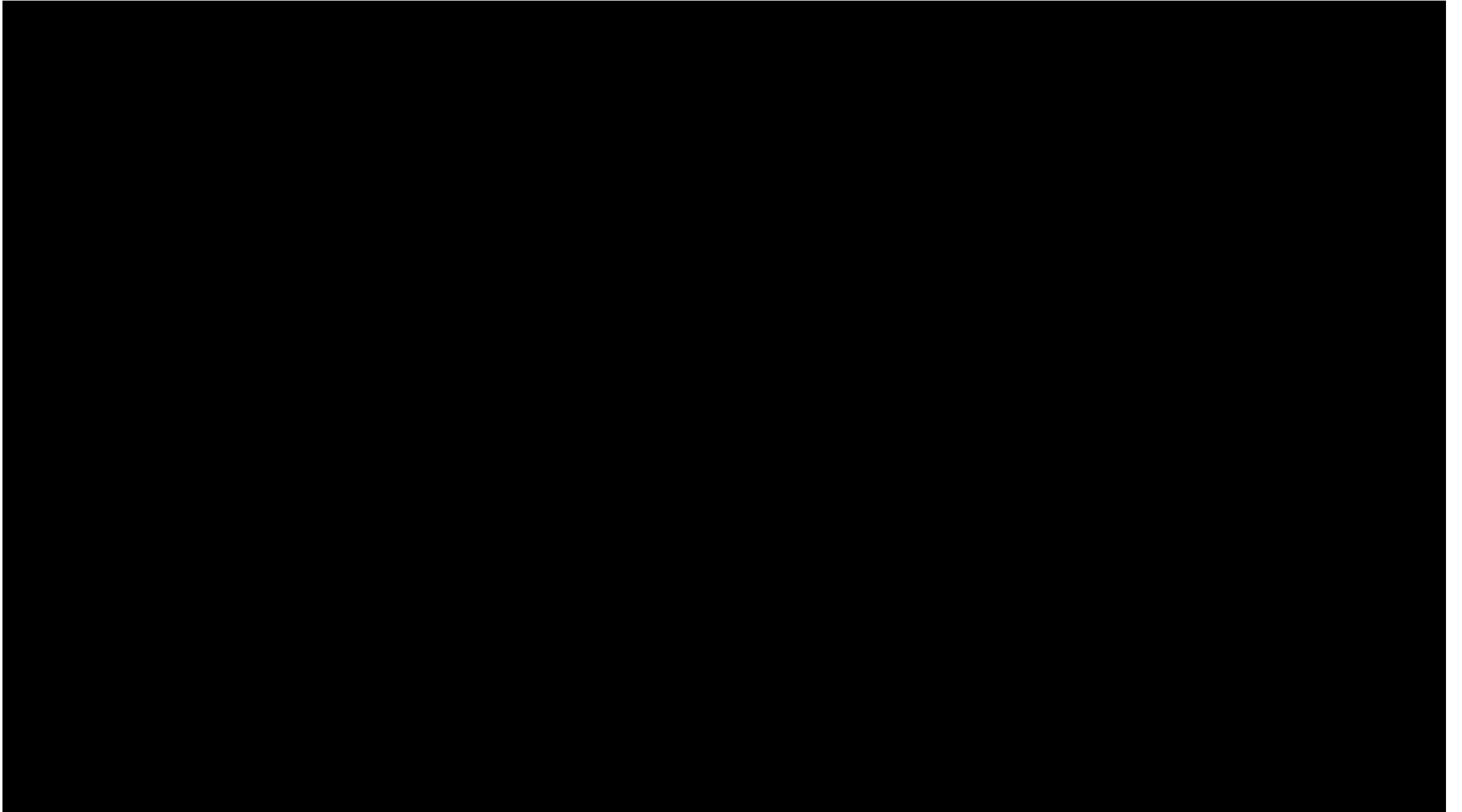


















A few cautions before considering relocation..

- Relocation is expensive
  - ~\$400,000 to relocate property before renovation for sale
- Relocation carries risks
  - Structure can be damaged or destroyed during relocation
  - Utility coordination often required
  - New property location may be incompatible with structure
- Will relocation maintain historic integrity?
  - Does removal of structure remove any of its historic context?

# Thank you!

- Roy Jackson, FDOT Office of Environmental Management
- Terri Newman, FDOT Environmental Manager
- Hal Jones Contractor, Inc.
- England-Thims & Miller, Inc.
- Wantman Group (WGI), Inc.
- Springfield Improvement Association and Archives
- Springfield Preservation and Revitalization (SPAR)
- Thomas McDonald and BTS Builders
- Florida Division of Historic Resources
- City of Jacksonville
- City of St. Augustine