

MEMO

To: Catherine Owen, FDOT, District 5
From: Kirsten Armstrong, MPhil, SEARCH; Angela Matusik, MA, SEARCH
CC: Beth Chambless, MS, RPA, SEARCH
Date: 4/16/2020
Re: Supplemental Information regarding 8LA02957 for the Tav-Dora Trail Study

Lake County has approached the Florida Department of Transportation (FDOT), District 5 about the possibility of conducting a study of alternatives for the proposed Tav-Dora Trail project in Lake County, Florida. The proposed trail will travel from Disston Avenue, in Tavares, east to Tremain Street, in Mount Dora. The County's preferred alternative is along a railroad corridor, segments of which have been previously recorded as the Seaboard Coast Line Railroad (8LA02957). The following summarizes 8LA02957 and adjacent resources within the study area, which is defined as the preferred trail alternative along the railroad corridor.

BRIEF HISTORIC CONTEXT

The segment of the Seaboard Coast Line Railroad (8LA02957) from Disston Avenue to Tremain Street is a section of a larger line originally built as part of the Sanford and Lake Eustis Railway. Chartered in 1886, the 29.5-mile branch traveled from Sanford to Tavares, through the towns of Sylvan Lake, Paola, Cassia, Sorrento, and Mount Dora. The construction was undertaken by the Jacksonville, Tampa & Key West (J. T. & K. W.) Railway and was completed in 1887 (Cooper 2015; Pettengill 1998; Robinson 1992).

By 1886, Mount Dora's early newspaper *The Mount Dora Voice* was publishing stories about accessibility issues for the town, as there were neither train nor steamboat links at the time. The Sanford and Lake Eustis line through Mount Dora solved this issue, assisting the economy by bringing in tourists, who used the town as a retreat for hunting, fishing, and boating, and by providing the ability to ship citrus and other products (Cooper 2015; Pettengill 1998; Robinson 1992). By 1890, this line was incorporated into Henry Plant's system of railroads, which was then consolidated into the Atlantic Coast Line Railroad in 1902. Passenger trains continued service into Mount Dora until the 1950s (Cooper 2015). In 1967, the Atlantic Coast Line Railroad merged with the Seaboard Air Line Railroad to become the Seaboard Coast Line Railroad. The Seaboard Coast Line Railroad was incorporated into CSX during the 1980s (Robinson 1993). This portion of the original Sanford and Lake Eustis Railway was leased to the Florida Central Railroad in 1986 (Janus Research 2012).

Based on desktop review of aerials, it appears tracks remain throughout the entirety of the current project study area.

FLORIDA MASTER SITE FILE DATA

A review of the Florida Master Site File (FMSF) GIS database (updated January 2020) indicates that 21 cultural resource surveys have recorded the Seaboard Coast Line Railroad (8LA02957) (**Table 1**). Only surveys intersecting 8LA02957 within or adjacent to the Tav-Dora Trail Study Area are described below. **Figure 1** displays 8LA02957 within the project study area and SHPO eligibility determinations made on the recorded segments.

Table 1. Previous Cultural Resources Surveys intersecting 8LA02957.

FMSF No.	Title	Year	Reference	8LA02957 SHPO Determination
1573	Historic Resource Survey Report – Downtown Mount Dora	1987	Melanie V. Barr Associates	Not included
12231	Cultural Resource Assessment Survey of the Bradshaw Property, Lake and Sumter Counties, Florida	2005	Archaeological Consultants, Inc.	Ineligible
13194	Technical Memorandum: Cultural Resource Overview Leesburg Trails PD&E Study, Lake County, Florida	2006	SEARCH	Ineligible
14288	Cultural Resource Assessment Survey Wekiva Parkway (SR 429)/SR 46 Realignment PD&E Study, Orange, Lake and Seminole Counties, Florida	2997	Janus Research and CH2MHill	Ineligible
14726	A Cultural Resource Assessment Survey of the Tavares Station Tract, Lake County, Florida	2007	Environmental Services, Inc.	Eligible
15529	Technical Memorandum: Reconnaissance Survey of Proposed Realignment to County Road (CR) 455 at Howey Height, Lake County, Florida	2008	SEARCH	Ineligible; Insufficient Information for entire length
15343	The City of Mount Dora Historic Structure Survey and National Register Nominations, City of Mount Dora, Lake County, Florida	2008	Bland & Associates	Not included
15644	Addendum: Cultural Resource Assessment Survey, Wekiva Parkway (SR 419)/ SR 46 Realignment PD&E Study, Orange, Lake and Seminole Counties	2008	Archaeological Consultants, Inc, Janus Research, and CH2MHill	Ineligible
16740	Archaeological Investigations at the Ferndale Preserve and Palatlkaha Environmental and Agricultural Reserve Park, Lake County, Florida	2009	S&ME, Inc.	Ineligible
17491	Cultural Resource Assessment Survey of CR 561 Project Development and Environment Study, Lake County, Florida	2009	SEARCH	Ineligible
18145	Phase I Cultural Resource Assessment Survey of the Proposed Gardenia Trail Phase III Project, Lake County, Florida	2008	SEARCH	Ineligible
19277	Cultural Resource Assessment Survey of State Road 19 from CR 48 to CR 561, Lake County, Florida	2012	SEARCH	Eligible

Table 1. Previous Cultural Resources Surveys intersecting 8LA02957.

FMSF No.	Title	Year	Reference	8LA02957 SHPO Determination
19698	Cultural Resource Assessment Survey of a Portion of the Lake Wekiva Trail Project Development & Environment Study	2012	Janus Research	Eligible
20339	Phase I Cultural Resource Assessment Survey of County Road 19A from US 441/SR19 to Old 441, Lake County, Florida	2008	SEARCH	Not included
22431	Cultural Resource Assessment Survey Addendum for the Wekiva Trail Segment 2 (Alternative B) Project, Lake County, Florida	2015	Janus Research	Ineligible
23233	Technical Memorandum: Cultural Resources Reconnaissance Survey and Effects Evaluation for the Proposed Tav-Lee Trail Extension Lake County, Florida	2016	SEARCH	Eligible
23849	Florida Gas Transmission Company (FGT), Wekiva Parkway Relocation Project, Lake and Seminole Counties, Florida	2017	SEARCH	Overall line eligible; Segment within APE not eligible
24555	Cultural Resource Assessment Survey for the Roundabout at CR 19A and Eudora Road/Old US Highway 441, Lake County, Florida	2017	SEARCH	Eligible
25034	Phase I Cultural Resources Assessment of the Taurus Groveland Property, Lake County, Florida	2018	SEARCH	Ineligible
26094	Cultural Resource Assessment Survey of SR 50 from CR 565 (Villa City Road) to Brown Street, Groveland, Lake County, Florida	2019	SEARCH	Ineligible
26203	Cultural Resources Assessment Survey for the Round Lake Road from the Lake-Orange County Line to SR 44 Project Development and Environment Study, Lake County, Florida	2019	SEARCH	Eligible
26236	Cultural Resource Assessment Survey of State Road 500 (US 441) from Lake Ella Road to Avenida Central, Lake County, Florida	2019	SEARCH	Ineligible
26304	Cultural Resource Assessment Survey for the Roadway Jurisdictional Transfer of State Road 46 (Section 11130000) from West of Swan Road to West of Hojin Street and of and State Road 46A (Section 11580000) from Arundel Way to State Road 46, Lake County, Florida	2019	SEARCH	Ineligible
26656	Technical Memorandum: Cultural Resource Assessment Survey Addendum for the Lake Wekiva Trail, Segment 2, from State Road 46 to Hojin Street, Lake County, Florida	2019	SEARCH	Ineligible

Yellow shaded surveys were conducted within the Tav-Dora Trail Study Area

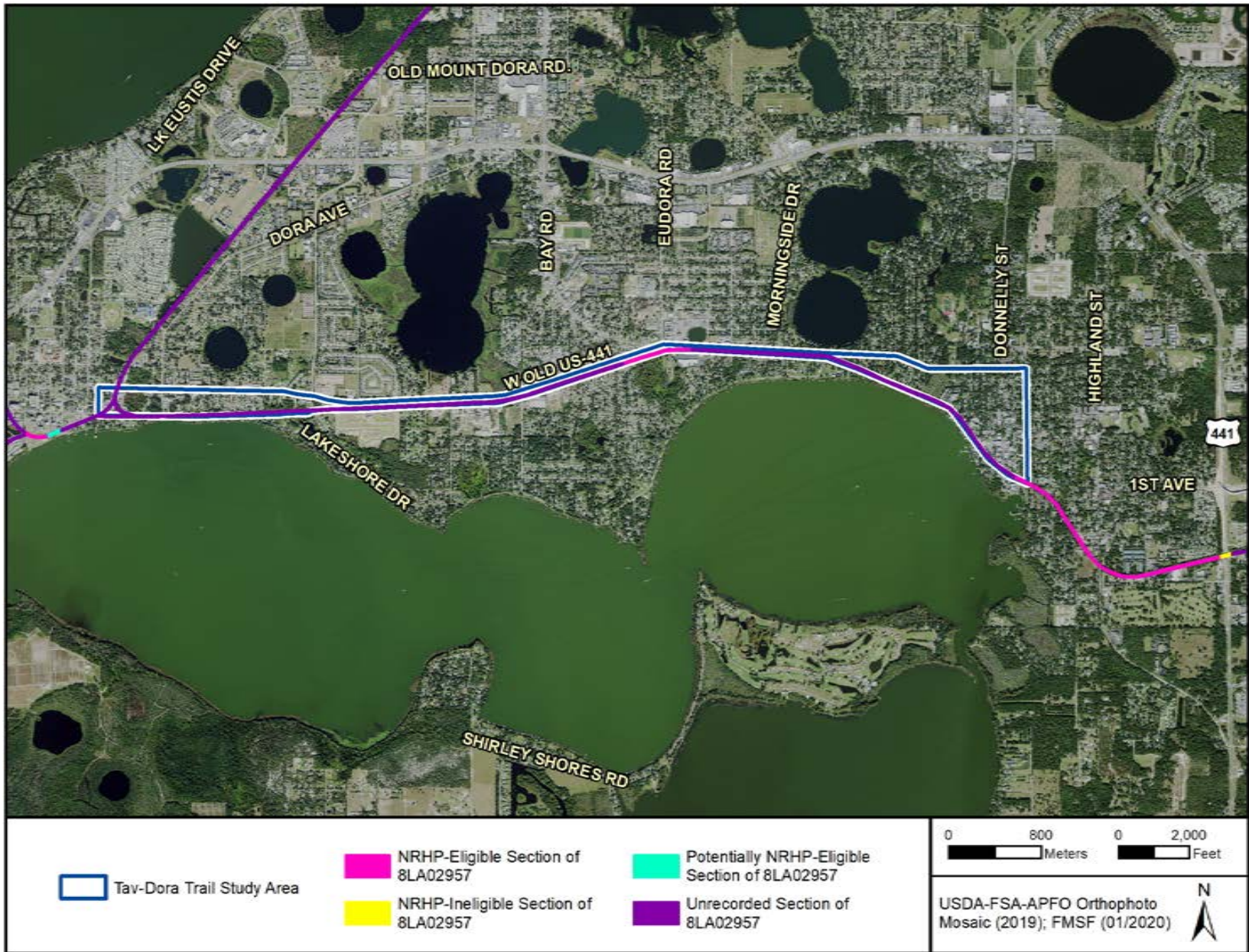


Figure 1. Recorded and unrecorded sections of the Seaboard Coast Line Railroad (8LA02957) through the Tav-Dora Trail Study Area.

Surveys intersecting 8LA02957 within Tav-Dora Trail Study Area

The FMSF review indicates that five cultural resource surveys intersect the Seaboard Coast Line Railroad (8LA02957) within the study area (see **Table 1**).

Although FMSF Survey Numbers 1573, 15343, and 20339 intersect the Seaboard Coast Line Railroad (8LA02957), review of the reports indicates that the resource was neither recorded nor evaluated during those surveys.

FMSF Survey Number 24555 was conducted by SEARCH in support of the CR 19A and Eudora Road/Old US Highway 441 Roundabout in Lake County, Florida (SEARCH 2017). The segment surveyed in 2017 consisted of an approximately 0.38-mile (0.62-kilometer) section of 8LA02957 travelling roughly east-west. SEARCH recommended this segment of 8LA02957 eligible for the National Register of Historic Places (NRHP), and on November 3, 2017 the State Historic Preservation Officer (SHPO) concurred with the recommendation (SEARCH 2017).

The FMSF review also indicates that FMSF Survey Number 19698 recorded a segment of the Seaboard Coast Line Railroad (8LA02957) intersecting a small portion of the eastern terminus of the Tav-Dora Trail Study Area. This survey provides relevant information on a similar rail-to-trail project in the vicinity of the current Study Area and is described in more detail below.

Comprehensive Review of Survey 19698

In 2012, Janus Research conducted an initial survey of a portion of the proposed Lake Wekiva Trail Project. FMSF Survey Number 19698 surveyed an approximately 1.4-mile (2.3 kilometer) segment of the railroad, starting approximately 250 feet (76.2 meters) west of Tremain Street and continuing east to US 441. This segment of the Seaboard Coast Line Railroad (8LA02957) was found to retain its historic appearance and significant railroad elements, which the NRHP Multiple Property Nomination Form, *Florida's Historic Railroad Resources*, defines as an F.3 property type (Rail Structure: Roadbed) consisting of ballast, cross ties, rails, and tie plates (Johnston and Mattick 2000). Additionally, research indicated that this segment was part of the original Sanford and Lake Eustis Railway. Although the segment surveyed by Janus Research does not continue to serve its historical purpose, their research suggested that it retains its association with Community Planning and Development, Commerce, and Transportation in the area during the late 19th and early 20th centuries. As a result of FMSF Survey Number 19698, this segment of the Seaboard Coast Line Railroad (8LA02957) was recommended eligible by Janus Research under Criterion A and was determined eligible for the NRHP by SHPO on February 13, 2013 (Janus Research 2012).

In 2016, Janus Research produced a report titled *Cultural Resources Section 106 Effects Consultation Case Study for: Lake Wekiva Trail Project Development and Environment Study* (FMSF Survey Number 23037) as a follow-up to the Cultural Resource Assessment Survey (CRAS) (FMSF Survey Number 19698). This report documents the potential for effects that the proposed Wekiva Trail would have upon the Seaboard Coast Line Railroad (8LA02957), the

Tremain Street Bridge (8LA04384), and the Seaboard Coast Line Railroad Bridge over US 441 (8LA04481), and details alternatives and consultation conducted in order to minimize these effects.

Alternatives were considered for the proposed, 14-foot, paved, shared-use path, and were named Alternative Trail Corridor (ATC) 1-1, ATC 1-2, and ATC 1-3 (Table 2).

Table 2. Wekiva Trail Alternatives as discussed in FMSF Survey Number 23037.

Alternative	Description
ATC 1-1	<ul style="list-style-type: none"> • ATC 1-1 is the preferred alternative and would follow the existing railroad grade from just west of Tremain Street to State Road (SR) 46 in Sorrento, Florida. • Requires that the existing railroad rails are removed, regrading of the existing embankment, and construction of the 14-foot, paved shared-use path. • Historic railroad bridges, the Tremain Street Bridge (8LA04384), and the Seaboard Coast Line Railroad Bridge over US 441 (8LA04481), would need to be modified.
ATC 1-2	<ul style="list-style-type: none"> • Side path following local streets from the planned Tremain Street Trailhead, located just north of the Tremain Street Bridge (8LA04384), to Round Lake Road. From there, the trail would follow the existing railroad corridor from to SR 46 in Sorrento, Florida. • Side-path would be constructed along existing State, County, and City roadways. • Not viable due to property impacts to residents, utility relocations, increased safety and operational concerns, and a lack of support by local governments.
ATC 1-3	<ul style="list-style-type: none"> • Side path following local streets from the planned Tremain Street Trailhead, located just north of the Tremain Street Bridge (8LA04384), to Round Lake Road US 441. From there, the trail would follow the existing railroad corridor from to SR 46 in Sorrento Florida. • Side-path would be constructed along existing State, County, and City roadways. • Not viable due to property impacts to residents, utility relocations, increased safety and operational concerns, and a lack of support by local governments.

Additionally, a no-build alternative was considered. This alternative did not meet the project need, a social and economic demand for shared-use paths, and it was inconsistent with the City of Mount Dora master plan and the Lake County Trails master plan. Outside of the segment of 8LA02957 surveyed during FMSF Survey Number 19698, there are notable instances where the tracks have been removed and adjacent properties have acquired the former railroad right-of-way. A further concern of the no-build alternative, then, was the foreseeable loss of the historic railroad, including the railroad elements and its discernible corridor.

As part of the consultation process, three Cultural Resource Committee (CRC) meetings were conducted. The third CRC meeting, conducted on January 19, 2016, specifically outlined the need for a Memorandum of Agreement (MOA) and the process of drafting and circulating that MOA.

FMSF Survey Number 23037 concluded by stating that the proposed Wekiva Trail would result in an adverse effect to the Seaboard Coast Line Railroad (8LA02957) and that there would be no adverse effect on the two railroad bridges (8LA04384 and 8LA04481). The report further concluded with the following as potential mitigation measures to be included in the MOA:

- Maintenance and interpretation of railroad elements, structures, and artifacts that may be retained such as rail spur lines, rail switches, stairs/retaining walls, signage, crossing cabinets, rail crossing signals, and railroad mile markers, etc.
- Interpretative markers and/or kiosks.
- Continued consultation with locally interested parties.
- Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) documentation.

The Florida SHPO concurred with the findings in FMSF Survey Number 23037 on June 21, 2016 (Janus Research 2016).

The final *Memorandum of Agreement between the United States Department of Transportation, Federal Highway Administration, and the Florida State Historic Preservation Officer Regarding the Seaboard Coast Line Railroad Between Tremain Street and US 441 in Mount Dora, Lake County, Florida* was signed by the Federal Highway Administration (FHWA) and the FDOT on December 7, 2016 and SHPO on December 12, 2016.

The MOA agrees that the preferred alternative shall be used for construction, wherein the trail will follow the existing alignment of the Seaboard Coast Line Railroad (8LA02957). The major stipulations created in order to minimize effects to the railroad are outlined in **Table 3**.

Table 3. MOA stipulations for the Wekiva Trail Project.

Category	Action	Summary
Documentation	Documentation for the Seaboard Coast Line Railroad (8LA02957), the Tremain Street Bridge (8LA04384), and the Seaboard Coast Line Railroad Bridge over US 441 (8LA04481) will be conducted and will follow Level II HAER standards.	Select drawings of existing railway and bridge plans
		Photographs with large format negatives.
		Written narrative description, summary of significance, and historical context
Salvage and Reuse	Representative and/or significant elements from the Seaboard Coast Line Railroad (8LA02957) must be identified and salvaged.	May be incorporated into interpretive displays or left in place.
		Identification and reuse to be coordinated with the Design and Aesthetics Committee, including FHWA and SHPO.
		Elements identified for salvage to be removed in a manner that minimizes damage and stored in a protected place. Restoration shall follow the Secretary of the Interior Standards (SOI) in consultation with SHPO.
Public Education	Interpretive displays located along the public trail corridor must be developed.	Information will provide a context of the railroad.
		Displays will be designed to reasonably withstand exposure to weather conditions.
		Design and Aesthetics Committee will determine number and content of panels.

FMSF Resources Recorded Adjacent to or Intersecting 8LA02957

The FMSF review indicates that 15 cultural resources are adjacent to or intersect the Seaboard Coast Line Railroad (8LA02957) within the Tav-Dora Trail Study Area (**Table 4**).

Table 4. Previously Recorded Cultural Resources Adjacent to or Intersecting 8LA02957 within the Tav-Dora Trail Study Area.

Historic Structures				
FMSF No.	Address	Year Built	Surveyor Evaluation	SHPO Determination
8LA00269a	100 N Alexander Street	ca. 1883	Potential Contributor to Historic District	Eligible
8LA00269b	100 N Alexander Street	ca. 1908	Eligible	Eligible
8LA00269c	100 N Alexander Street	ca. 1926	Potential Contributor to Historic District	Eligible
8LA00380	234 W 3 rd Avenue	ca. 1915	Potential Contributor to Historic District	Not Evaluated
8LA00391	239 W 4 th Avenue	ca. 1918	Ineligible	Not Evaluated
8LA00297	Moorehead Warehouse/210 Baker Street	ca. 1930	Ineligible	Not Evaluated
8LA03887	250 N Donnelly Street	ca. 1950	Ineligible	Not Evaluated
8LA03895	100-11 E 3 rd Avenue	ca. 1940	Ineligible	Not Evaluated
8LA03981	1942 Locomotive	ca. 1942	Ineligible	Not Evaluated
8LA03892	1938 SAL Passenger Car	ca. 1938	Ineligible	Not Evaluated
Bridges				
FMSF No.	Name	Year Built	SHPO Determination	
8LA04384	Tremain Street Bridge	ca. 1887	Eligible	
NRHP-Listed Historic District/Resource Group				
FMSF No.	Name	Period of Significance	NRHP-Listed Date	
8LA00269	Lakeside Inn	1883 - 1929	March 19, 1987	
8LA04008	Mount Dora Historic District	1877 - 1959	October 1, 2009	
NRHP-Listed Historic Structures				
FMSF No.	Name/Address	Year Built	Style	
8LA00281	Mount Dora ACL Railroad Station	ca. 1915	Frame Vernacular	
8LA02027	426 Lake Dora Drive	ca. 1925	Colonial Revival	

Yellow-shaded resources intersect 8LA02957.

CONCLUSIONS

Based on the above review, it is likely that intact segments of the Seaboard Coast Line Railroad (8LA02957) between Disston Avenue and Tremain Street can be reasonably expected to be recommended and determined eligible for listing in the NRHP, under Criterion A for association with Community Planning and Development, Commerce, and Transportation. Given the similarities with the trail project associated with FMSF Survey Number 19698, the prospective Tav-Dora Trail will likely require additional consultation, coordination, and mitigation, as the removal of the track/rails and replacement with a paved trail will likely be considered an adverse effect. SEARCH recommends that a CRAS should be conducted to initiate consultation and to record and evaluate all portions of 8LA02957 within the current project limits. Following

submittal of the CRAS, a Section 106 Effects document should be prepared to assess project-related effects. Minimization and mitigation commitments made during agency consultation will be formalized in a MOA between the consulting parties.

REFERENCES CITED

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- 2017 Cultural Resource Assessment Survey for the Roundabout at CR 19A and Eudora Road/Old US Highway 441, Lake County, Florida. Florida Master Site File Survey Number 24555. On file, Florida Division of Historical Resources, Tallahassee and SEARCH, Newberry.