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February 3, 2003

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Mr. Jonathan Bruce, Chairman
Manatee County Board of County Commissioners
P. O. 25010
Bradenton, FL 34206

Re: The destruction of Manatee County's cultural resources

Dear Commissioner Bruce:

Since 1981 and the completion of my Master's internship with the Manatee County Planning Department, I have attempted to assist our County in addressing impacts to our nonrenewable cultural resources. Most recently, as you are aware, I have worked closely with Charlie Hunsicker in the careful use of the Emerson Point/State C.A.R.L. property on Sned Island. I am currently 1st Vice-Chairman of the County's Historic Preservation Board.

Over the years, I have repeatedly, and at no charge, appeared at public hearings to raise concerns over archaeological sites, and often at the eleventh hour of proceedings, as I, too, must work for a living. After several events over the last two years, it is clear to me that something more comprehensive and systematic must be done to protect our County's cultural resource sites.

In November, 2001, I noticed land clearing operations on a small parcel (PID#21348) located just east of my home here on Terra Ceia Island. Because I had found an archaeological site in this location in 1982, the "Terra Ceia Bayou" site (8Ma285), I contacted Carol Clarke and Michael Wood of the Planning Department. Twenty-four days later, I received a phone call from Planner Troy Salsbury who reported they had not received any permit applications for that parcel and that I should contact Jim Lee of the Building Department. I faxed Mr. Lee, as well as Karen Collins-Fleming of Environmental Management, given that the parcel contains sensitive native hammock vegetation. Failing to get a reply, I wrote Commissioner Stein, then chairperson, on February 28, 2002. I have yet to receive a reply. The house is now built on the parcel and the archaeological site has been destroyed.

Several months ago at a Board meeting of the Terra Ceia Village Improvement Association, I learned that the old Tillett grove on Terra Ceia Road had been sold and that a subdivision, "Sabal Groves" had been approved. When I had a chance to drive by, I found the parcel had been cleared of trees, as well as of the two 1920s buildings that had

stood on it. To my knowledge, no professional assessment had been made of these historic structures, nor had an archaeological survey been required. So, more of our history has been lost without documentation.

In December, 2002, while driving out Erie Road to deliver a report to a client, I noticed where a citrus grove had once stood, there was now an open field – located between two residential subdivisions. I had long kept an eye on this acreage, because I knew that a prehistoric burial mound, 8Ma44, was located on it. I talked with the owner and found that the County had approved a rezone for a subdivision there. When I checked the files at the Planning Department, imagine my surprise when I read in a staff report that “no known historic features of significance exist on this site nor is this an area of high sensitivity for archaeological resources.” This surprise was compounded after I received a copy of a letter to the Southwest Florida Water Management District from the Division of Historical Resources, Tallahassee, noting the presence of archaeological site 8Ma44 on the property and requiring a professional archaeological survey. Human skeletal remains, no matter their age, are protected under Chapter 872, F.S., with felony level provisions.

From the above events, as well as others, it is clear that Manatee County is not doing enough to address impacts on our cultural resources. We simply do not have any professional staff qualified to make decisions on these matters. Understand that I do not fault our staff: I fully appreciate how hard they work and how busy they are. But archaeology cannot be done by unqualified personnel.

I recently attended the first “Imagine Manatee” session. One of my suggestions for a better future was “Manatee County needs an historic preservation ordinance.” I would add, “and qualified, professional staff to implement it.” In support of that, I would explain, again, what cultural resource managers like myself seemingly have to repeat endlessly to citizens, developers, - and to elected officials, too: Cultural resources do **not** prevent development! There are **no** laws, federal, state, or local, that **mandate** preservation of sites. These sites are not like active eagle nests. More often than not, the simple discovery and recordation of a site by a professional archaeologist is all that is necessary to mitigate its subsequent destruction. Some sites do require additional excavation and documentation in order to recover a representative sample of their contents. But even burial mounds, which are rare, can be totally excavated, thus allowing subsequent construction to proceed. Archaeology, both prehistoric and historic, is about preserving **information**.

I dare say that if you needed surgery, you wouldn't go to a friend who had an interest in medicine. Determinations about and investigations of cultural resources, whether prehistoric mounds or standing historic structures, should be made by qualified professionals. These resources are irreplaceable parts of our national and local heritage: Once they're gone, they're gone forever. Unlike other “endangered species,” cultural resource sites cannot reproduce. I would respectfully urge you and your fellow commissioners to instruct the Historic Preservation Board and the Historical Commission

to join together to draft an historic preservation ordinance for Manatee County – before it's too late.

To quote Abraham Lincoln: "A country with no regard for its past will have little worth remembering in the future."

Sincerely,

A handwritten signature in black ink that reads "Brad William Burger". The signature is written in a cursive, flowing style.

Brad William Burger, M.A., R.P.A.
Archaeologist

cc: Manatee County Board of County Commissioners
Mr. Chips Shore
Mrs. Cathy Slusser
Mr. Allen Garner