



FLORIDA DEPARTMENT OF STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

Ms. Meg Stack
Cardno
3905 Crescent Park Drive
Riverview, Florida 33578

September 27, 2018

RE: DHR Project File No.: 2018-4012-A Received by DHR: August 9, 2018
Phase II Testing at 8MA2165, Manatee County, Florida

DHR Project File No.: 2018-4012-B Received by DHR: August 30, 2018
Cultural Resource Assessment Survey of the Hecht Property, Manatee County, Florida

Dear Ms. Stack:

We note that between April and May 2018, Cardno, Inc., (Cardno) conducted the above referenced Phase I survey of the Hecht Property, and between June and July 2018, Cardno conducted Phase II testing of archaeological site 8MA2165 on behalf of Lennar Homes, LLC, as due diligence. Our office proceeded to review this report with the expectation that Lennar Homes, LLC, will be engaging in permitting processes that will require this office to comment on possible adverse impacts to cultural resources listed or eligible for listing in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural, or archaeological significance. We recommend at the time such actions are taken, a copy of this letter be forwarded to the permitting agency(ies) with the application. This letter does not constitute a review under Section 106 of the *National Historic Preservation Act*.

Cardno recorded three (3) new archaeological sites, 8MA2164, 8MA2165, and 8MA2166, and one (1) archaeological occurrence (AO) within the project area during their investigation. AOs fail to meet minimum criteria to be recorded as sites and are therefore ineligible for NRHP listing. Cardno previously reported the results of testing at site 8MA2164 and supplied a NRHP evaluation because the site straddles the boundary between two different projects they were surveying. The Division of Historical Resources (DHR) previously concurred with Cardno that site 8MA2164 is NRHP- ineligible (see DHR No.: 2018-0424-B and -C). Cardno determined that site 8MA2166 is ineligible for NRHP listing due to limited artifact assemblage and low research potential.

Phase I testing indicated site 8MA2165 had a deep, moderately dense prehistoric lithic deposit; therefore, Cardno suggested that site 8MA2165 needed additional investigation to make a NRHP determination. Following consultation with DHR, Cardno completed Phase II testing of 8MA2165. During both archaeological investigations Cardno observed and documented extensive previous and on-going looting activity at 8MA2165. Additionally, what appeared to be a moderately dense deposit during Phase I shovel testing was not documented during the Phase II investigation, although it is uncertain if this is a result of looting throughout the site or natural variation in artifact deposition intensities. The lack of diagnostic artifacts limits the site's potential for additional research, though Cardno posits that the site may have previously contained diagnostic artifacts, thereby explaining the extensive looting activity. Ultimately, regardless of the theorized previous potential, Cardno determined that pervasive looting has severely impacted the integrity of site 8MA2165, thereby rendering it ineligible for NRHP listing.

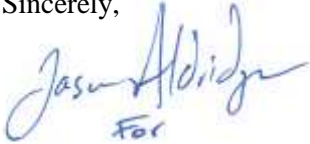
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Based on the information provided, our office concurs that both 8MA2165 and 8MA2166 are NRHP-ineligible, and we find both of the submitted CRAS reports complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*. Because this project is not yet subject to permitting requirements from a state or federal agency, our office abstains from supplying a determination of effects until such time that permitting agencies (and associated permit requirements) are identified for this project.

If I can be of any further help, or if you have any questions about this letter, please feel free to contact Lindsay Rothrock at Lindsay.Rothrock@dos.myflorida.com.

Sincerely,

A handwritten signature in blue ink that reads "Jason Aldridge". Below the signature, the word "For" is written in a smaller, lighter blue font.

Timothy A. Parsons, Ph.D.
Director, Division of Historical Resources
and State Historic Preservation Officer