

Dr. Judy Bense, Chair
Florida Historical Commission
University of West Florida
Archaeology Institute
Pensacola, FL 32514

January 15, 2004

Dear Dr. Bense:

I write to you on the current matter of abolishing the Isolated Finds Policy (IFP) of the State of Florida. In short, I believe as a practicing professional archaeologist that the elimination of this program will result in dire consequences for the scientific understanding of Florida's archaeological heritage.

As a native born Floridian, a member of the Florida Anthropological Society since high school, a professional archaeologist who has published in the Florida Anthropologist since 1968, as a Southeastern U.S. prehistorian who has worked at a University based research institute for 30 years with continuous positive interactions with the collecting public, and as a scientist who is currently trying to photo document the older (ca. 1960-80) private underwater Paleoindian artifact collections for Florida's rivers, I can only say that a state-sponsored and regulated hobby diver collecting program is absolutely essential to the understanding of Florida's underwater archaeological heritage. In the limited case of Paleoindian projectile points alone, most of the data are in the hands of amateur artifact collectors who have the time and interest to recover such specimens from underwater. Not only are most of the important artifacts amateur collector derived, but many of the important underwater sites are too such as the famous Page/Ladson site.

While I understand that no program such as this is perfect and that there are difficulties in effectively enforcing the regulations and in consisting getting accurate and reliable reports from the public, to do away with it would only make things worse as illegal collecting would continue and important scientific data now being reported would be effectively lost.

Here at the S.C. Institute of Archaeology and Anthropology, we by state law manage the underwater cultural resources for the state. We have a hobby diver program where interested members of the public can purchase a license to collect artifacts that are loose on the river bottoms. These licenses must be carried by the divers and our State Department of Natural Resource officers are empowered to check for licenses on the rivers. Those who have licenses are required to report to our Institute quarterly the nature of their finds. They are required to keep the artifacts for at least 60 days during which time we have the right to examine and record what has been found. After that the ownership of the specimens transfers to the individual. We have never confiscated any artifacts from this program. I would emphasize that over 80% of the underwater sites we have on file have been reported by our hobby divers.

To maximize the information that comes from hobby diver collecting, it is important to have a professional on the state end to review the reports and get back to the diver if there is something of archaeological interest. We have two staff members who administer our program, issuing licenses and reviewing reports, and conducting educational workshops and fieldschools to help train the hobbyist to provide us with more usable information. We have found the more educational attention we give the divers, the more they cooperate and the better the data they provide us. The fees generated from licensing can be used to help offset the costs of maintaining such a program.

To eliminate hobby diver collecting in Florida will not get us all what we ultimately desire: better knowledge and preservation of Florida's ancient past. The recovery of artifacts even by the naive public which accidentally encounters a potsherd or spearpoint can never be eliminated. Furthermore, illegal collecting will continue by the unscrupulous and that data will certainly be hidden from professional eyes. Last, and probably most important, the Isolated Finds Program and others like it do generate usable scientific data that cannot be obtained otherwise without the expenditure of large sums of public money. Even if that were desirable, one intensive, expensive professional survey may not yield what years of collecting and reporting can provide. Furthermore, you lose the opportunity to interact with interested private citizens who can help in other ways to foster archaeological research and good will between government and the citizens. More accountability by using a licensing or permitting system, and more professional attention to the underwater collecting community are ways to increase the value of such finds.

I hope my comments are of some help in resolving the ultimate disposition of Florida's Isolated Finds Program. If I can answer any questions concerning the scientific value of such a program or provide additional detail on our Institute's program, please do not hesitate to ask.

Thank you for your consideration of this letter.

Sincerely,

Albert C. Goodyear
Archaeologist