

Florida Historical Commission

**RE: Recent Discussion of the Florida Isolated Finds Program**

Dear Commission Members:

The general membership of the Florida Archaeological Council, Inc. (Council) recently held its annual meeting in Gainesville, Florida. On May 13<sup>th</sup>, approximately 30 members including the Board of Directors met to discuss, among other agenda items, the organization's position on the status of Florida's Isolated Finds Program (Program).

During the discussion, Dr. Ryan Wheeler, Chief of the Bureau of Archaeological Research, was asked to provide a brief summary of the status of the Program. He reported that after public comment at several public meetings and agency feedback during public discussions, three initial options for the future of the Program have been identified:

- 1) discontinue the Program
- 2) promulgate rules for the program in its current form
- 3) develop a before-the-fact permitting process.

A request was extended for other options and continues to remain open through this process.

Previous discussion in 2004 among the members of the Council prompted former Council President Dr. Robert Austin to prepare a letter on behalf of the Council to the Florida Historical Commission (Commission) in support of a scenario similar to option #3 above: the development of a permit-based system allowing for the collection of isolated archaeological specimens from Florida's river bottoms. During the May 13, 2005 meeting, however, the Council voted to rescind this previous position due to substantial disagreement among the membership.

In a subsequent informal poll of the members in attendance, it was determined that there was no majority support for any isolated finds program. Of those who did support some sort of a program, support was equally divided for continuation of the present program and adoption of a new permit-based program. Despite considerable discussion, the Council was unable to reach consensus in support of any of the three options.

Finally, the Council adopted a motion expressing the following four points:

1. The Isolated Finds Program in its current form is not working
2. Professional archaeologists want to continue to work closely with collectors
3. None of the three alternatives are supported by the members of the Council

4. If any program is developed in the future, the Division should work with law enforcement agencies to ensure that the program is legally and practically enforceable

In conclusion, Florida Archaeological Council wishes to convey to the Florida Historical Commission that a program such as isolated finds that grants permission to collect artifacts on state-owned lands has certain inherent problems, and that the Council cannot reach consensus in support of any of the solutions proposed to date. As the organization representing professional archaeologists in Florida, the Council is well aware of the complexities involved in any practical and viable solution, and the lack of agreement among the membership reflects these unresolved difficulties.

Sincerely,

James J. Miller, PhD, RPA  
President, Florida Archaeological Council, Inc.