Mary Glowacki, Ph.D., Chief and State Archaeologist  
Office of the Bureau Chief, Bureau of Archaeological Research  
B. Calvin Jones Center for Archaeology at the Governor Martin House  
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Tallahassee, FL 32301 USA  

8 July 2013  

Dear Dr. Glowacki:  

Thank you for your letter dated 14 June 2013 in response to our request for a 1A-32 permit for the excavation and documentation of deposits, assemblages, human remains, and associated mortuary furniture and artifacts at the former Arthur G. Dozier School burial ground (“Boot Hill Cemetery”) in Jackson County, Florida. We are writing to respond to your request for additional information, and to ask for clarification on some of the points in your letter. For your convenience, we have organized our response into three parts.  

In addition, we are attaching a letter from Dr. Karen Rosenberg, President of the American Association of Physical Anthropologists, who writes to underscore the critical research value of skeletal material in archaeological science. An additional letter is currently being prepared by Dr. Leith Mullings, President of the American Anthropological Association. We will forward this letter to you and interested parties when it becomes available.  

Part 1  

In your letter to us dated 14 June 2013, you wrote:  

As completion of a final report for the existing surface reconnaissance Permit Number: 1112.032 is crucial to gathering all the information that would be necessary to adequately assess the pending application for an excavation permit, we need detailed information clarification regarding the following:  

- Registration, documentation and mapping of the cemetery as currently demarcated.  
- Identification of existing and any additional graves through multiple remote sensing and archaeological methods, such as ground penetrating radar (GPR) and soil chemistry.  
- Research of the site's history, creation and use based on archival research and ethnographic interviews.
• Research of primary and secondary sources to determine who is buried in the cemetery and the morbidity and mortality patterns of those who died.
• Determination of whether there was one or more burial areas at the school.

We respond to each issue below, citing the relevant passages in our 117-page report that we submitted you on 10 December 2012 (note: there are no substantive changes to this report with regard to the Boot Hill Cemetery and its immediate environs unless otherwise noted below). We also provide further clarification where needed.

“Registration, documentation and mapping of the cemetery as currently demarcated”

See pp. 23-46, “Defining the Cemetery.” The Boot Hill Cemetery (8JA1860) was recorded with the Florida Master Site File on 29 December 2011. The form was completed with the information known about the site as of that date. The FMSF form will be updated with the information about the site that has been uncovered since that time once the evaluation of the ground-penetrating radar data has been finalized and all of the site boundaries have been documented to the extent possible (through excavation).

“Identification of existing and any additional graves through multiple remote sensing and archaeological methods, such as ground penetrating radar (GPR) and soil chemistry”

See pp. 34-46, “Archaeological Field Results.” Eight distinctive GPR grids were collected in and around the reported boundaries of the Boot Hill Cemetery fence and marker locations. It was determined early in the investigation that the actual cemetery limits extended outside the delineated cemetery boundaries. These areas had to be cleared of trees and ground vegetation before shallow trenching and limited mechanical stripping was used to remove the plow zone and verify the locations of grave shafts and fence line (Figure 1). Soil chemistry was also used to differentiate possible and probable grave shafts from surrounding undisturbed areas.

“Research of the site’s history, creation and use based on archival research and ethnographic interviews”

See pp. 47-90, “Estimating the Number of Deaths and Expected Burials.” Research into the creation and use of the Boot Hill Cemetery was conducted on the limited records available, given that many of the primary sources of information (e.g., school records, documents, drawings, and the like) that might have been useful in this search were either non-existent or destroyed when the school was closed in 2011. Secondary sources, such as newspaper articles, letters from the school to families, and witness interviews were also used. For example, 67 newspaper articles were examined related to the 1914 fire as were coroner records located at the Jackson County Courthouse, which resulted in 12 names of individuals who reportedly perished in the fire. This is two more than were previously noted in the 2008-09 State investigation by FDLE.
Figure 1. Reconstructed fence line perimeter of the Boot Hill Cemetery based on posthole distribution observed during ground-truthing of GPR anomalies. The burial ground, as currently marked, is shown in the lower left corner of the map as a box containing crosses.

“Research of primary and secondary sources to determine who is buried in the cemetery and the morbidity and mortality patterns of those who died”

See pp. 91-98, “Trends in Morbidity and Mortality.”
“Determination of whether there was one or more burial areas at the school”

See p. 90, “Recommendations for Future Work.” Historic documents and mapping from 1947 indicate that there is one cemetery at the former Dozier School for Boys. This location has been identified as the Boot Hill Cemetery location. The search for additional burial areas continues.

With regard to the last point, we would like to take this opportunity to update you on our progress to date. As you know, currently researchers at USF have two open permits for archaeological research and fieldwork at the former Arthur G. Dozier School for Boys. These include Permit #1112.032 (Dr. Richard Estabrook, PI) and Permit #1213.018 (Dr. Christian Wells, PI) for ground-penetrating radar (GPR) survey on the North Campus and South Campus, respectively. The approved research includes global positioning system (GPS) and total station data collection of the locations of identified historical/archaeological resources and related landscape features; and testing of subsurface anomalies through archaeological excavation, soil analysis, and horizontal clearing with hand and mechanical excavation. Both permits have recently been extended to 9 January 2014 by Julia C. Byrd (Senior Archaeologist, BAR) in correspondence dated 28 June 2013.

The reason that we hold two separate permits is that different parcels of the property are managed by different State entities, and the scope of the work has been extended through the course of the research. Also, Permit #1213.018 proceeds after a court order for USF to perform additional searches on the property controlled by the Department of Juvenile Justice (DJJ). It is important that these permits remain open and active, and that a third, separate, 1A-32 permit for excavation and documentation of deposits, assemblages, human remains, and associated mortuary furniture and artifacts at the ‘Boot Hill Cemetery’ (8JA1860) burial ground on the North Campus be granted for the reasons outlined below.

The search for additional burial locations is on-going. This work continues because of: 1) the large of amount of space to be searched (ca. 1400 acres of mostly wooded terrain); and 2) new information about possible burial locations that continues to surface from additional interviews with informants. To date, we have completed more than 30 GPR prospection grids on the South Campus in areas where individuals have provided information about the possible existence of additional burials. Ground truthing and horizontal clearing of the plowzone by hand and mechanical excavation in areas of interest within these regions have not yet been completed. The scope of work to continue with this aspect of the project was designed to occur during the same time as exhumations on the North Campus for those burials already identified. This research design is considered to be the most time efficient and cost effective for the project. The Florida Legislature recently allocated $190,000 to the University of South Florida specifically to continue to search and exhume remains found on the property simultaneously on both the campuses, as outlined in the scope of work. It is not feasible to continue to search multiple areas of the property before beginning exhumations, given our current budget as established by the State, as that would significantly increase the amount of time in the field and thus unfairly increase the costs beyond those provided by the Legislature.
The scope of work as presented in our funding request to the State includes:

Phase I (on-going)
1. Additional GRP evaluation in the areas adjacent of Boot Hill Cemetery and the South Campus property;
2. Archaeological test excavations in the areas marked by GPR anomalies, especially on the east side of the cemetery, to define the boundaries of the burial area and its spatial relationship with adjacent landscape features (roads, historical buildings, etc.);
3. Horizontal clearing through hand and mechanical excavation of the primary burial area to identify the exact number and locations of individual grave sites;

Phase II (Fall 2013 and Spring 2014)
1. Exhumation and skeletal autopsy including forensic pathological, anthropological, and bioarchaeological analysis of individuals from the cemetery to determine cause of death and identification for repatriation and re-interment;
2. Establish if there is one or more burial areas on the property;
3. Additional archival research of primary and secondary historical documents, maps, photographs, and related media;
4. Additional interviews with families, employees, community members, and other key stakeholders associated with the school’s history.

Phase III (Spring 2014)
1. Repatriation and re-interment of remains.
2. Creation of a USF Digital archive to make public the oral histories and research undertaken throughout this project.
3. Submit final reports signed.

In addition to the information presented above, through our recent request for continued access to the North Campus, we received correspondence on 5 June 2013 from Cheryl C. McCall, Chief of the Bureau of Public Land Administration, Division of State Lands, who provided us with a new map of the property, indicating additional lands owned (but not managed) by the State of Florida. This map (Figure 2) shows specific parcels of State land that we were unaware existed, based on previous maps that the State provided to us.

Please allow us to explain the significance of this new piece of information generously provided by the State. The 2009 FDLE report on the Dozier School for Boys cemetery states:

“The Global Positioning System (GPS) coordinates for the School Cemetery are 30° 45’ 59”N 85° 15’ 43”W, situated in Jackson County Township Range 4N-10W. The property is owned by the State of Florida Board of Trustees of the Internal Improvement Trust Fund and directly leased to the Florida Department of Health. The Department of Health has subleased the property to the Florida Department of Corrections (Lease # 2771) (See Figure 3).”
Figure 2. Current land leases of the Former Arthur G. Dozier School for Boys, in Marianna, Florida recently provided by the Bureau of Public Land Administration.

Note that Figure 3 in the FDLE report is a photo of the white crosses at the Boot Hill Cemetery. However, the coordinates listed in the report are for a reference point south of that location (Figure 3).

Also note that Lease # 2771 is held by the Department of Juvenile Justice, but it is for a parcel of land north of the Boot Hill Cemetery. This location is farther north than the current search area (approximately one half mile following the former roads, as evidenced in historical aerial images). Therefore, the Boot Hill Cemetery is not under the management of the Department of Juvenile Justice (see Figure 2). Instead, the parcel of land containing the Boot Hill Cemetery is under Permit #3447, PRIDE, Department of Corrections.

There have been several reports of graves witnessed to the north of the Boot Hill Cemetery as reported by former students of the school and families of the deceased, who were shown graves in multiple locations by staff of the school in the 1980s.
During the initial fieldwork at Boot Hill, the adjacent property to the north was evaluated by a pedestrian survey (approximately 100 yards) and by ground penetrating radar (GPR) (approximately 30 meters). However, this area had been used historically as a garbage dump and is heavily littered with debris and thick woods. It was determined that the underbrush would have to be cleared before more extensive searching could commence.

The area currently marked by Permit #2771 (approximately one half mile north) was unknown to the USF research team until several weeks ago when a new map with the permit boundaries (see Figure 2) was given to USF researchers by the Bureau of Public Land Administration.

It is therefore quite possible that the graves that were reported north of the Boot Hill Cemetery were located in this northern area and, in order to determine such, that area should be cleared of underbrush and thoroughly searched by pedestrian survey and GPR.

In 2012, the family of Thomas Varnadoe issued a motion with the Court to search for the remains and clandestine burial of Thomas (Varnadoe and Varnadoe vs. Dept. of Environmental Protection and Dept. of Juvenile Justice). The Court recently granted an extension of the Court Order until 9 January 2014 for USF researchers to conduct this search. According to the Court’s original Order, USF’s right to access to the property is absolute:
“Upon the entry of this Order and for one hundred and twenty (120) days following this Order [until January 9, 2014], The Departments [includes DEP and DJJ] are required to provide the USF research team referenced in Plaintiffs' Complaint with access to the South Campus of the School for the purpose of locating Thomas J. Varnadoe, Jr. 's remains.”

Although Boot Hill Cemetery is on the North Campus, as is the land controlled by DJJ (Permit # 2771), the relevance and intent of the Court’s Order is to find Thomas Varnadoe. In order to locate his remains, USF must exhume the burials at Boot Hill (including more than one person’s remains) and continue the field operations currently underway. Moreover, seven other families are also asking for repatriation of their brother’s remains.

The methods, protocols, and standard operating procedures (SOP) used in this investigation are the same as those employed by the USF Forensic Anthropology Laboratory in all of its forensic and bioarchaeological investigations. These methods and SOP are standard practice in forensic anthropology, and can be found on their website www.icfahr.usf.edu/rhi. These same protocols are used routinely for the search and recovery of human remains at crime scenes for law enforcement, for human identification and trauma analysis for medical examiners, and in cases of historic or archaeological remains completed for the BAR. Moreover, State of Florida Attorney General Pam Bondi has publicly acknowledged her support of these methods: http://thefloridachannel.org/video/62513-florida-cabinet-meeting/, 82:35-85:25.

Since the court has given USF and the families of boys buried at the school access, and has recently extended that Order to 9 January 2014, we requested that our current permits for the North Campus and South Campus be extended to this date. In addition, we request that our recent application for a 1A-32 permit for the excavation of Boot Hill Cemetery be granted in order to effectively complete the requested investigation.

Part 2

In your letter to us dated 14 June 2013, you wrote:

The final survey report should also provide a comprehensive analysis of the historical record regarding the Dozier School and its burial sites, as well as your efforts to gain access to school ledgers which you describe as exempt from public record requirements, and include detailed responses to the following questions:

- Regarding the GPR map of the Boot Hill area, how were "probable" and "possible" grave shaft determinations made, including any anomaly profiling that was conducted? Is there any indication that there are other interments in this area, and if not, why? How beneficial was the use of soil chemistry in this work?
- To what extent have you assessed the entire Dozier School property using remote sensing to locate additional burials?
• What physical and verbal reports have emerged, if any, to identify burial locations and to link them to specific individuals?

• Regarding an assessment of morbidity and mortality patterns, what efforts have been made to assess the degree of preservation of the human remains at Dozier School? Given the acidity of the soil and lack of embalment or use of caskets, to what extent is DNA and AMS testing possible?

We would like to take this opportunity to respond to these questions, each in turn below, and also ask for some clarification on the information you are requesting.

“Regarding the GPR map of the Boot Hill area, how were "probable" and "possible" grave shaft determinations made, including any anomaly profiling that was conducted? Is there any indication that there are other interments in this area, and if not, why? How beneficial was the use of soil chemistry in this work?”

The GPR results presented in our report (Kimmerle et al. 2012) show the processed and combined GPR data for all eight grids. These data have been processed and displayed as amplitude maps of “time-slices” generated by the GPR-Slice® software program, an industry standard (see GPR Remote Sensing in Archaeology by D. Goodman and S. Piro, Springer, 2013; Interpreting Ground-Penetrating Radar for Archaeology by L. Conyers, Left Coast Press, 2012).

The anomalies are considered “probable” and “possible” grave shafts based on the shape, size, depth, and spatial patterning of the amplitude mapping results as well as the results of the shallow plow zone trenching. The identification of grave shafts is based solely on their location within a known cemetery, their individual size and shape, their pattern in rows, and limited associated cemetery furniture (grave markers, etc.). Until confirmed by excavation, the anomalies remain classified as probable and possible grave shafts.

Finally, the soil chemistry determined that the soils in the area did not conform with the recorded soil series for this area. The soils within the Boot Hill Cemetery are less acidic and contain less clay than reported previously.

“To what extent have you assessed the entire Dozier School property using remote sensing to locate additional burials?”

The Dozier School property is roughly 1400 acres. To date, we have conducted GPR survey of roughly one acre on the North Campus and roughly five acres on the South Campus. Together, this accounts for approximately 0.5 percent of the total acreage of the property as currently marked. Given the time it takes to conduct GPR survey, we estimate that it would take an additional 27,880 hours (not including site preparation/vegetative clearance), or approximately 10.7 years with a full-time crew of two working year-round to complete a GPR survey of the entire property.
As you are well aware, given the impossibly large scale of such a task, this is why we have used various sampling strategies to narrow the search region. GPR prospection is a very intensive study of small targeted areas. Since much of the School property was historically composed of agricultural fields and probably not used for burials, it made sense to focus on smaller parcels of land for intensive investigation rather than larger spaces with less careful research. In our research, we have employed opportunistic and referral sampling based on historical archival data, interviews with key informants and other stakeholders, and environmental and geomorphological assessment of the existing terrain. These efforts have led us to identify the grids already surveyed as well as possible additional grids to the north of the Boot Hill Cemetery (for which we would need to keep our existing North Campus survey permit open and active).

“What physical and verbal reports have emerged, if any, to identify burial locations and to link them to specific individuals?”

While we are unclear as to what you mean by “physical reports”, summaries of the interviews that we have conducted (“verbal reports”) are reported in Kimmerle et al. 2012.

“Regarding an assessment of morbidity and mortality patterns, what efforts have been made to assess the degree of preservation of the human remains at Dozier School? Given the acidity of the soil and lack of embalmment or use of caskets, to what extent is DNA and AMS testing possible?”

As determined by Dr. Wells’s soil analysis (see Kimmerle et al. 2012:43-46), the soils are better characterized as loams (mixture of sand, silt, and clay), rather than clays (in fact, clay percent is a modest 6%). Also, average pH for the B horizon (where the suspected remains are located) is 6.37, which is close to neutral/alkaline. Thus, acidity of the soil matrix will not significantly impact preservation. Finally, the extractable phosphates are rather high compared to off-site (control) samples, indicating that mineral leaching (e.g., through erosion, for example, by rain, freeze/thaw, or gravity) is not a major issue. Thus, we anticipate preservation of human remains to be moderate-to-good. Moreover, in cases where human remains were separated from the soil matrix, such as with a wooden casket or other container, and so not subject to bioturbation (such as root action), we can expect good-to-excellent preservation.

With regard to your statement, “Given the acidity of the soil and lack of embalmment or use of caskets,” we ask: 1) Since the soil is not highly acidic (as reported in Wells et al. 2012:43-46), what do mean regarding the acidity of the soil?; 2) Will you please share with us the information you have that indicates that embalmment was not used (we do not know the extent to which it was used in this case)?; and 3) Will you please share with us the information you have that indicates that caskets were not used? There is ample historical documentation that caskets were manufactured onsite for use specifically at Boot Hill Cemetery in at least the majority of deaths, if not all (see Kimmerle et al. 2012).
Depending on your responses to the above questions, we can better assess the extent to which DNA and AMS radiocarbon dating will be efficacious. However, given the information we currently have about the preservation of the remains in the burial ground, we are confident that DNA and AMS radiocarbon dating will be useful tools in identifying individuals and dating some (i.e., pre-bomb) stratigraphic layers.

Part 3

In your letter to us dated 14 June 2013, you wrote:

Additionally, with respect to the pending permit application, we need the following information clarification in order to make an adequately informed analysis of the request:

- Procedures for site preparation including logistics, surveying and security;
- Procedures for excavation/exhumation;
- Procedures for chain of custody for physical evidence;
- Procedures for commingled human remains/re-association of fragments;
- Autopsy procedures;
- Site recording methods including use of photography;
- Procedures for the storage of human remains;
- Standards for adequate personal identification;
- Methods for the assessment of age, sex, and stature;
- Procedures for determining elapsed time since death;
- Procedures for re-interment;
- Your plans with respect to Ch. 497, Florida Statutes;
- The level of predicted success for determination of cause of death;
- The level of predicted success for identification necessary to justify exhumation and identification procedures.

We would like to take this opportunity to respond to each of these points by quoting directly from our original request for a 1A-32 permit for the excavation of Boot Hill Cemetery. Below, we also amend some of these points with additional details for clarification.

“Procedures for site preparation including logistics, surveying and security”

We are working closely with the Florida Attorney General’s Office, who has informed us that they will make arrangements to have law enforcement on site for security throughout the project.

“Procedures for excavation/exhumation”

As noted in our request for the permit, using the previously obtained GPR data from the burial area as our sampling frame, we propose to conduct archaeological excavation (including, but
not limited to: horizontal clearing, trenching, test excavation, and block excavation) using traditional archaeological methods, tools, and technologies to investigate the ‘Boot Hill Cemetery.’ The work will be divided into four phases, with each phase focused on a separate quadrant of the burial area. Work will commence at the suspected location of each grave shaft with excavation using heavy equipment and total station mapping by quadrant, focusing on the investigation of 10-12 burials per phase of excavation. Once the level of the burial is reached (ca. 0.75-1.00 m below ground surface), hand excavation will be used. Work will proceed in depth until all human remains and artifacts are recovered and accurately recorded, and culturally sterile soil is reached. All soil will be sifted through quarter-inch (or smaller) mesh screens. Burials and their contexts along with any associated features and deposits, as well as soil profiles, will be mapped by hand and in three dimensions with a GPS-enabled laser total station. The work will be conducted by USF faculty and advanced graduate students who have previous training and experience in archaeological, bioarchaeological, and forensic field research. In addition, several agencies have agreed to contribute staff for assistance onsite, including the Hillsborough County Sheriff’s Office, the Gadsden County Sheriff’s Office, the Sumter County Sheriff’s Office, and the Temple Terrace Police Department.

“Procedures for chain of custody for physical evidence”

While we maintain specific standard operating procedures for handling evidence to maintain and protect chain of custody for physical evidence in all our work (www.icfahr.usf.edu/rhi), this is a bioarchaeological investigation—not a criminal case, nor is Boot Hill Cemetery considered a crime scene; therefore, there is no immediate concern for chain of custody. Should this change during the course of our research, as standard practice we refer to the District Medical Examiner (in this case, Dr. Michael Hunter) and the Sheriff’s Office (in this case, Jackson County Sheriff Roberts).

“Procedures for commingled human remains/re-association of fragments; Autopsy procedures”

While we are uncertain why autopsy procedures would need to be used in this case (since all human remains are most likely skeletonized with full soft tissue decay), our standard operating procedures and reference guides for skeletal autopsies are provided here including the data forms used both in the field at the time of excavation and in the lab for skeletal analysis: www.icfahr.usf.edu/rhi.

“Site recording methods including use of photography”

Described above under “Procedures for excavation/exhumation.” If necessary, we can share with you the textbooks and field manuals that we routinely use in the courses and field schools that we teach at USF, which describe in detail standard archaeological “site recording methods including the use of photography.” They are further detailed in our SOP and reference guides: www.icfahr.usf.edu/rhi.
“Procedures for the storage of human remains”

As noted in our request for the permit, all materials collected will be transported to the archaeology and forensic laboratories at USF for analysis and conservation. This is a locked-down facility with limited and controlled access. We store forensic evidence and human remains at this facility for medical examiners and law enforcement from around the nation. We invite you and your staff to visit our facilities at USF to learn more about our work and our research methods.

“Standards for adequate personal identification”

As noted in our request for the permit, analysis of the human remains will include skeletal autopsy with forensic pathological, anthropological, and bioarchaeological analysis of individuals to determine cause of death and identification for repatriation and interment following the standard protocols used by the USF Forensic Anthropology Laboratory. The protocol and data forms can be found at www.icfahr.usf.edu/rhi. These are the same methods and protocols used for active missing and unidentified cases, and have been cited in reports submitted to BAR. Presumptive identifications can be made based on the age structure of individuals. Since we have a list of individuals who were buried at the school (children of varying ages), we can compare these. Positive identifications will be based on DNA analysis. In our permit application and in the supplemental letters, we outline the process by which family DNA samples are being collected. The family samples and skeletal samples collected from autopsy will all be sent to the University of North Texas for testing and comparison. The University of North Texas manages the database, collects samples, and performs all DNA testing at no cost to the State due to a federally funded grant to provide DNA analysis in cases of missing and unidentified persons. Familial DNA samples for comparison are being collected by the Hillsborough County Sheriff’s Office, which will submit those samples to the same laboratory for comparison. Plans for re-interment and/or long-term storage of artifacts will be developed in consultation with FDHR and other relevant stakeholders. Once the analysis is complete, the identified remains will be returned the associated families and the unknown will be re-interred in caskets and marked plots at the Boot Hill Cemetery. Markers and delineation of the cemetery will be determined with a broad range of input from families, DJJ, DEP, FDHR, NAACP, and local stakeholders. Analysis of the artifacts (including personal items, casket hardware, etc.) will include basic identification and recording as well as traditional type/variety and modal classifications and seriations of cultural material. Analysis of soils and sediments will include Munsell color, potential hydrogen, texture, organic matter, carbonates, phosphates and heavy metals to characterize the burial environment and address issues of preservation. We are also seeking funds from external funding agencies for AMS radiocarbon dating.

“Methods for the assessment of age, sex, and stature”

See above. If necessary, we can share with you the textbooks and field manuals that we routinely use in the courses and field schools that we teach at USF, which describe in detail
standard “methods for the assessment of age, sex, and stature.” They are further detailed in our SOP and reference guides: www.icfahr.usf.edu/rhi, which include the specific forms and methods we use.

“Procedures for determining elapsed time since death”

See above. If necessary, we can share with you the textbooks and field manuals that we routinely use in the courses and field schools that we teach at USF, which describe in detail standard “procedures for determining elapsed time since death.” They are further detailed in our SOP and reference guides: www.icfahr.usf.edu/rhi, which include the specific forms and methods we use.

“Procedures for re-interment”

As noted in our request for the permit, plans for re-interment and/or long-term storage of artifacts will be developed in consultation with FDHR and other relevant stakeholders. Once the analysis is complete, the identified remains will be returned families and the unknown will be re-interred in caskets and marked plots at Boot Hill Cemetery. Markers and delineation of the cemetery will be determined with a broad range of input from families, DJJ, DEP, FDHR, NAACP, and local stakeholders. The funeral home, burial services, caskets, and grave markers will be contracted with a local funeral home. The style, massing, and inscriptions on the markers will be in keeping with the historic setting of the cemetery. The costs associated with this process are to be determined, and are based on a similar proposal for exhumation and re-interment at the Florida State Hospital in Chattahoochee, Florida. The State Hospital has five cemeteries dating from the 1800s-present. All of the cemeteries are segregated by ancestry and gender. Despite their detailed records, many of the graves have become lost, unmarked, and or disturbed by construction and development of the land. In an effort to the preserve the graves, the Florida Department of Children and Families hired the Chicora Foundation, Inc. from South Carolina in 2011 to develop a strategic plan to move and preserve the cemeteries, which is on file with Florida Master Site File (Survey No. 18394). This case provides important reference for our work.

“Your plans with respect to Ch. 497, Florida Statutes”

We kindly request that you provide more specific information as to which section(s) of the Statute you are referring to in this point. As you know, Chapter 497 concerns a wide array of issues, including purchasing burial plots, funeral home operations, embalming practices, cemetery licenses and fees, and so forth. We do not immediately see which sections of this Chapter are immediately relevant to the proposed archaeological research, and would appreciate your clarification on this point.
“The level of predicted success for determination of cause of death”

We are uncertain what kind of information you are requesting here. How would “level of predicted success” be measured? Based on what type of existing evidence? As you are well aware, determination of cause of death depends on numerous intersecting variables (both biological and environmental) specific to the burial environment. Without exhuming the remains, we have no scientific basis to make such an estimation. However, if necessary, we can prepare a brief or scientific paper reviewing the literature on similar cases. Still, this information should not be used to estimate “level of predicted success” since prior data are relative to the conditions of that specific case. We are also uncertain as to how this question is relevant to the issuance of a standard archaeological permit, and would appreciate more information, especially because our research intent is concerned with individual identification. Cause of death may assist us in making identifications, but is not critical to doing so. We would appreciate your guidance on this issue.

“The level of predicted success for identification necessary to justify exhumation and identification procedures”

Our questions and concerns described immediately above also apply here. In sum, we are uncertain: 1) what kind of answer you are looking for, 2) how this should be measured or estimated scientifically (and ethically), and 3) what the relevance of this question is for an archaeological permit; knowing the relevance may help us prepare an appropriate response.

We appreciate the opportunity to respond to your request for additional information, and are available to provide additional clarification as needed. We look forward to hearing from you.

Sincerely,

E. Christian Wells, Ph.D.

Erin H. Kimmerle, Ph.D.
Erin H. Kimmerle, Ph.D.
Associate Professor of Anthropology
University of South Florida
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Dear Professor Kimmerle,

I write this letter on behalf of the Executive Committee of the American Association of Physical Anthropologists. Our organization represents and supports many scientific disciplines that study humans and other primates employing a variety of approaches, from genetics to human biology. Together this research improves our understanding of the lives of humans from the past, as well as the variety of lifestyles that we, as a species, experience today. In many cases, the study of human skeletal material provides us with information about the past that would not be available any other way, shedding light on otherwise undocumented lives and health of people across ethnic and social boundaries. The examination of the skeletons of humans is an important tool in this endeavor, and it is in strong support of the value of this research that this letter is written.

Skeletons preserve information that opens windows on the lives and health of people and the histories of groups. Human skeletal remains preserve a variety of indicators about the life experiences of individuals, including disease and trauma which together may speak to the history of social inequality and violence. In addition, questions about the ancestry of individuals or groups, the effects of environmental variables on the shape of the body, as well as the kinds of diet and activity are addressed through osteological study. This research uses scientific methods systematized, standardized, and verified by decades of anthropological, medical, and forensic research. Indeed, many different types of osteological analyses meet the Daubert criterion and are accepted as evidence in U.S. courts of law.

Osteological research makes significant contributions to studies of humans from the past. For example, the ongoing study of burials as part of the Jamestown Rediscovery Archaeological Project has contributed to our understanding of the lives of the first Europeans to colonize eastern North America. We have learned about how individuals survived...
disease, famine, accidents, and normal life events by careful examinations of bones and teeth, placing these within their archaeological context. Sharing these important and fascinating findings, both with other scientists and with the population at large, is a crucial aspect of this work. The Smithsonian Institution’s Written in Bone exhibit is an excellent example of the value of this research and its accessibility to the public. This is but one of dozens of recent examples that we could cite to highlight the utility of these investigations.

People benefit from the work of researchers in this discipline. Scientists working with recovered human skeletal remains are able to help identify missing individuals and illuminate factors that might have contributed to or caused death. Sometimes the results of this study resolve missing persons cases, provide legal and personal closure to the death of individuals, and may help prevent criminal acts from occurring again. In more medically related research, studies by anthropologists provide information about the origin, evolution and spread of particular diseases and show the variety of responses bone has to activity, diet, and disease. Their results further inform treatment protocols, and, more importantly, encourage medical practitioners to think broadly about human variation.

In light of the brief examples provided, we at the Association urge you to support the work of individuals engaged in this body of scientific research. Studies of the skeleton have significant potential to illuminate the lives of both past and living people. By allowing anthropologists access to skeletal remains, you allow them to realize this potential, improving our understanding of the lifeways of people from the past and helping the lives of people in the present.

Sincerely,

Karen R. Rosenberg
President, American Association of Physical Anthropologists