



July 27, 2009

Nancy Sutley, Chair  
Council on Environmental Quality  
Executive Office of the President  
722 Jackson Place, NW  
Washington, D.C. 20503

Dear Ms. Sutley,

The Society for Historical Archaeology (SHA) commends the President for his Proclamation on developing a National Policy for Oceans, Our Coasts, and The Great Lakes and congratulates the Council on Environmental Quality (CEQ) for its appointment to Chair the Inter-Agency Policy Task Force. We are especially heartened to see that preserving maritime heritage is among the priorities to be included in the national policy. The development of a national policy for our maritime heritage is of great interest to SHA as is evidenced by our involvement in the development of maritime heritage law and policy in the United States and throughout the world.

The SHA is an international organization, the largest scholarly group concerned with the archaeology of the modern world, with a membership of over 2,500 from all 50 states and several nations around the world. The Society advocates for a global perspective in the study and protection of historical and underwater cultural resources by educating the public and policy makers and providing a valued resource for knowledge exchange, professional development, and the maintenance of high ethical standards. The SHA represents historical archaeologists in academia, museums, government agencies, and the private sector.

Maritime heritage has been a primary concern of SHA. We have a subcommittee that promotes the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, which entered into force in January 2009. The Convention provides a framework and represents an international standard on the treatment of underwater cultural heritage. SHA members have regularly participated in the UNESCO Meetings of Experts and contributed to work on developing and implementing the 2001 Convention, particularly the Annex Rules, a detailed set of standards and requirements for managing activities directed at underwater cultural heritage based on the 1996 ICOMOS Charter on the Protection and Management of Underwater Cultural Heritage. SHA has also supported international and US efforts to protect the Titanic through an international agreement, guidelines and proposed legislation. We are committed to the preservation of maritime heritage, including the physical record of human kind in

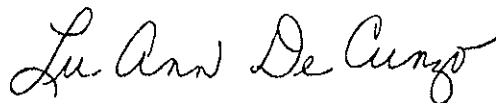
prehistoric shorelines, shipwrecks, inundated cities, harbor works, and other traces of our past.

We hope that CEQ will provide leadership on maritime heritage issues associated with the Inter-Agency Policy Task Force or seek experts who will assist CEQ in issues associated with national maritime heritage policy. There are private organizations, such as ours, that can provide guidance on protection of our shipwrecks and submerged resources that include prehistoric and historical sites. It is our view that the nation needs to strengthen our laws and regulations to protect the tangible remains of maritime history from treasure hunters who seek to exploit them for monetary purposes, while not recognizing their true cultural and heritage value. We need enhanced laws to protect our maritime heritage from looting and unwanted salvage. This would include maritime heritage in the sea subject to US jurisdiction as well as authority to cooperate with other nations in protecting maritime heritage beyond US jurisdiction in the high seas, like Titanic. This should extend even to the sea subject to jurisdiction of other nations, as US treasure hunters are salvaging shipwrecks and other maritime heritage off the coasts of Spain, Portugal, France, the UK and other nations. This salvage is being done without authorization of the US or other nations, nor are there any requirements or standards for scientific research, recovery and conservation in the public interest.

As indicated above, SHA has also been involved in seeking congressional protection of the Titanic. While we have not achieved the legislation to accomplish this yet, we will continue our efforts with the new Congress to seek legislation to protect Titanic and other maritime heritage.

We look forward to the development of a national and international policy for maritime heritage, offer our assistance, and would appreciate the opportunity for input before the issuing of a final policy.

Sincerely,

A handwritten signature in cursive script that reads "Lu Ann DeCunzo".

Lu Ann DeCunzo  
President