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Vice Chairman

Reid J. Nelson
Executive Director, Acting



January 21, 2022

The Honorable Deb Haaland
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Brenda Mallory
Chair, Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20503

The Honorable Gina M. Raimondo
Secretary of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

The Honorable Thomas J. Vilsack
Secretary of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Co-Chairs of the America the Beautiful Interagency Working Group:

Acting as chairman of the Advisory Council on Historic Preservation (ACHP) during that position's current vacancy, I am pleased to provide the following summary of views expressed during recent listening sessions on America the Beautiful sponsored by the ACHP. Given the ACHP's interests in the protection of historic properties and our role as a member of the Interagency Working Group, we hosted these listening sessions to help us all better understand how cultural resources relate to achieving the goals of America the Beautiful. Four sessions took place, two for tribal and Native Hawaiian leaders, and two for preservation advocates and the general public. A broad array of tribal and nontribal participants from across the country attended, including representatives of federal historic preservation offices, tribal and Native Hawaiian leaders, State and Tribal Historic Preservation Offices, and preservation organizations. While the following summary cannot capture every view expressed during the listening sessions, it highlights key recurring themes.

Natural landscapes are cultural landscapes. Many participants stressed this fundamental premise. In what today is the United States, indigenous people have existed as part of the environment since time immemorial, and Europeans first ventured here more than 500 years ago. It is doubtful that there are any areas where there has been no human interaction or impact, and where there are not cultural values associated with the landscape. It is therefore important to acknowledge that the protection of one often equates to the protection of the other.

Conserving America's lands should not equate with seeking to create "wilderness." Considerable concern was voiced by participants that America the Beautiful not promote conservation of lands using past models of "wilderness" areas. Too frequently, such "wilderness" models meant removal or neglect of cultural resources that reflect prior human use of the land. For Indian tribes and Native Hawaiians, prior versions of conservation enacted in America also removed them from the landscapes and the resources they depend on for subsistence, cultural perpetuation, and as guaranteed in treaty and through reserved rights. The concepts of a "healthy" and "natural" landscape necessarily should include human interaction with that landscape, notably for tribal members and Native Hawaiians.

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Defining what is meant by “conserving” lands and waters is critical, including considering when cultural resources are deemed to be “conserved.” Participants grappled with what standard, short of permanent protection, should be considered as “conservation” for cultural resources. Is a conservation or preservation covenant needed if the resource is privately owned, or is “durable management” of such properties sufficient? Listing of cultural resources in the National Register of Historic Places and in similar state or local registers offers recognition and a layer of protection but does not preclude destruction and/or alteration of listed resources. Depending on how conservation is ultimately defined, these registers of historic resources potentially could be mined for data for development of the American Conservation and Stewardship Atlas. Additionally, tribal and Native Hawaiian participants expressed the view that areas considered conserved under America the Beautiful should be above and beyond areas already conserved or preserved as a result of tribal efforts (reservation lands, land and water subject to treaty and reserved rights protections, etc.)

Tribal and Native Hawaiian voices should be elevated in discussions regarding cultural resources and America the Beautiful. Tribal and Native Hawaiian leaders participating in the listening sessions indicated that tribal and Native Hawaiian voices are often outweighed by interest groups and nontribal participants, even when tribal resources and landscapes are being considered. When this occurs, federal agencies fail to adequately identify tribal and Native Hawaiian resources to inform management decisions regarding conservation. In contrast, America the Beautiful should promote stewardship of federally owned natural and cultural resources in partnership with Indian tribes and Native Hawaiians, and consultation should include Free Prior and Informed Consent.

The unique needs and traditional knowledge of tribes and Native Hawaiians should be considered by federal agencies in conserving and managing federal lands and waters and the cultural resources they contain. Tribal and Native Hawaiian participants indicated that protection of resources significant to them has not always been supported by federal agencies. For example, culturally relevant fish and plant species are often overlooked in favor of recreation and grazing needs. The America the Beautiful initiative can lead by example through thorough consideration of tribal and Native Hawaiian needs. Likewise, the initiative should incorporate Indigenous Knowledge (IK) in its science-based approach to conservation (while protecting IK from Freedom of Information Act and other government release). For example, traditional practices—including placing fire on the land—could help address climate impacts on conserved lands.

Listening to local communities regarding the resources they value is critical. A number of participants made this point, emphasizing that local communities have the ground-level knowledge of the natural and cultural resources of their communities and what is important to local residents. Also, local governments often can be particularly nimble in partnering with nongovernmental entities to advance conservation goals.

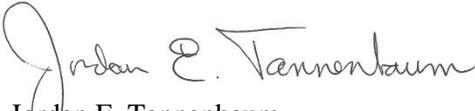
Cultural resources in communities across the country that include relatively small but meaningful natural components should be included in assessments of lands being conserved. Participants in the listening sessions identified a number of historic property types that intrinsically include natural components. They may be relatively small compared to large conserved areas of federal, tribal, or state lands. However, they are located to varying degrees throughout the country, thus heightening their potential cumulative contribution to the measurement of America’s conserved lands while also being of historic importance to their local communities. Property types discussed at the listening sessions included historic cemeteries; historic urban/suburban parks and gardens; battlefields; historic working farms; and historic houses with large associated grounds.

Increased conservation of America's lands and waters could assist in protecting archaeological sites, which are being destroyed by climate change at an alarming rate. Participants noted that drought, permafrost melt, erosion, wildfires, etc., are threatening an increasing number of archaeological sites, both terrestrial and submerged. Ironically, many sites contain thousands of years of information about human/environment interactions that potentially could be important to understanding the environmental challenges we are facing today.

Organizations that address cultural resources through conservation-based models could be potential participants in the America the Beautiful initiative. Listening session participants highlighted a number of such organizations, including state-based Century Farms programs; conservancies such as The Archaeological Conservancy; the American Battlefield Trust; the Chesapeake Conservation Partnership (whose Chesapeake Conservation Atlas includes a heritage component); and the Sentinel Landscapes Partnership.

The ACHP hopes this summary of key themes from our listening sessions will assist the Interagency Working Group as the America the Beautiful initiative continues to evolve. The ACHP remains committed to assisting the Interagency Working Group and the Administration in advancing the important goals of this initiative. Please feel free to contact me if the ACHP can answer questions or provide additional information, or your staff may wish to follow up with acting ACHP Executive Director Reid Nelson at rmelson@achp.gov. Thank you.

Sincerely,



Jordan E. Tannenbaum
Vice Chairman