



**Advisory Council on Historic Preservation Response  
to the America the Beautiful Interagency Working Group  
Regarding the Department of the Interior  
Request for Information to Inform Interagency Efforts  
to Develop the American Conservation and Stewardship Atlas**

*Selected Questions and Responses*

Preservation of cultural resources should be integral to the natural resource conservation efforts of the America the Beautiful initiative. Natural landscapes are cultural landscapes, and, whether urban or rural, contain cultural resources of importance to local communities. In establishing a baseline of information on America's lands and waters that are conserved or restored, the American Conservation and Stewardship Atlas (Atlas) should include information on properties that have been—or should be—conserved for both their natural and cultural attributes. The responses below to selected questions in the recent Request for Information on the Atlas provide further detail on how and why this should be accomplished.

***Science and Data.** What data sources, standards, and technical approaches should be applied to data included in the Atlas to ensure that it is an authoritative and useful tool for the public?*

Considerable data exists on historic properties with notable associated natural resources. The following are key data sources that should initially be reviewed.

**National Register of Historic Places.** The National Register of Historic Places is maintained by the National Park Service. Created by the National Historic Preservation Act (NHPA) of 1966, the National Register is considered the official list of the nation's historic places worthy of preservation. (That said, it should be noted that it is an ever-evolving list, and there are many historic properties that have yet to be listed in or found to be eligible for listing.) [Data downloads](#) are available. The ACHP cannot speak as to whether the data can be filtered in ways that may be pertinent to the Atlas, such as resource type, parcel size, ownership, etc. However, the National Register is a fundamental place to start in looking at data on America's historic properties.

**Historic American Landscapes Survey (HALS).** Administered by the National Park Service, [HALS](#) identifies and documents historically significant designed and vernacular cultural landscapes. Natural resources are key intrinsic elements of many of these documented historic landscapes. HALS is an important potential data source for the Atlas.

**Federal, State, Tribal, and Local Preservation Officers and Indian tribes.** In accordance with the NHPA, [Federal Preservation Officers](#), [State Historic Preservation Officers](#) (SHPOs), [Tribal Historic Preservation Officers](#) (THPOs), and [Certified Local Governments](#) manage programs to promote preservation of historic places within their sphere of concern. Another point of contact and source of information for local preservation commissions is the [National Alliance of Preservation Commissions](#). All federal, tribal, state, and local preservation offices maintain records of historic properties, but the degree

to which that data is available in GIS or other digital formats varies widely. Additionally, many Indian tribes that have not formally sought THPO status also promote preservation of historic places and have databases or records that identify locations significant to their people. While some of the data may duplicate information from the National Register, other cultural resources will also be identified. Likewise, the ability to filter and utilize the data for the purposes of the Atlas will probably vary from what is available for the National Register.

Regardless of the data source, mapping cultural resources always requires consideration of how much information about their character and location can be disclosed publicly without risking harm to the resources. This issue is particularly of concern for sacred sites and other sites of traditional cultural importance to Indian tribes and Native Hawaiians, where confidentiality regarding specific location data is critical to the very nature of the sites. Also, archaeological sites can be put at risk from looting by location specificity. To address such concerns, the NHPA and the Archaeological Resources Protection Act authorize withholding location data. Sometimes concerns can be addressed by mapping broad areas where cultural resources are present rather than identifying specific locations.

***Conservation as a Continuum.*** *How can the Atlas reflect the meaningful conservation work already underway in America?*

- *What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America?*
- *What are the attributes of lands and waters that should be included in the Atlas? Considerations could include, for example, a clearly defined geographic boundary, status of ecological function, representation of species and habitats, extent of disturbance, expected future risks from climate change or other human stressors, ecosystem connectivity, or durability of management status.*
- *How can the Atlas best reflect the contributions of State, local, Tribal, territorial, and private lands?*

Listing properties in the National Register (or determining properties eligible for listing) does not afford them permanent protection, but it does require that preservation values be factored into federal agency planning and decisions. Federal agencies have affirmative stewardship responsibilities under Section 110 of the NHPA to identify and preserve historic properties under their control. Also, Section 106 of the NHPA requires federal agencies to consider the effects of projects they carry out, approve, or fund on properties listed in or eligible for listing on the National Register, whether the properties are federally or nonfederally owned. Therefore, the Atlas should include National Register-listed or eligible properties that are associated with natural resources, given that a level of protection is triggered by National Register listing or eligibility.

Historic properties of religious and cultural significance to Indian tribes and Native Hawaiian organizations are frequently inseparable from the natural landscape. In many cases, limiting the description of these resources to their natural attributes only leaves the story incomplete. While characterized in many ways (e.g., sacred sites, traditional cultural property, cultural landscapes), these locations reflect the symbiotic relationship between nature and culture that is increasingly threatened by climate change, resource management, and development. Providing additional consideration of National Register-listed or eligible properties associated with America's first peoples increases the potential for the Atlas to serve as a catalyst of conservation.

In addition to the NHPA, many places have state and local preservation laws that require environmental review when designated historic properties will be affected by certain project activities. Ideally, historic properties associated with natural resources protected by these laws also should be included among the Atlas resources that have short-of-permanent protection.

In contrast, some historic properties are protected by preservation or conservation easements that generally provide a much higher level of protection, often requiring perpetual preservation of the property. Easements may sometimes be held by SHPOs, but also may be held by preservation or conservation nonprofits, such as the Archaeological Conservancy and the American Battlefield Trust. While it may be more difficult to locate the data, historic properties that are associated with natural resources and are covered by easements should be included in the Atlas.

Cultural resources in communities across the country that include relatively small but meaningful natural components should be included in the Atlas. A number of historic property types 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. Some of these property types include historic cemeteries; historic urban/suburban parks and gardens; battlefields; historic working farms; historic trails; historic canals; historic rail rights-of-way (some of which have been turned into trails); and historic houses with large associated grounds.

*March 7, 2022*