



Preserving America's Heritage

January 12, 2011

Mr. Jonathan Putnam
Office of International Affairs
National Park Service
1201 Eye Street NW (0050)
Washington, DC 20005

Dear Mr. Putnam:

The Advisory Council on Historic Preservation (ACHP) is pleased to submit comments on the National Park Service's "30-Day Notice of Opportunity for Public Comment on U.S. Nominations to the World Heritage List and Potential Additions to the U.S. World Heritage Tentative List" (75 Fed. Reg. 77901-77903). The ACHP provides these comments in its statutory role of advisor to the President and the Congress and as one of three federal agencies named in Section 401 of the National Historic Preservation Act (§16 U.S.C. 470a-1) as consulting agencies with the Department of the Interior (DOI) on the implementation of the World Heritage Program.

The ACHP is delighted to see DOI both move forward with formal nominations to the World Heritage List and to consider additions to the U.S. Tentative List. The United States took a leadership role in the creation of the World Heritage Convention in 1972 and should continue to exercise that leadership as the program approaches its 40th anniversary. The current DOI initiative is an important step toward that end.

The ACHP's comments consist of two sections. The first section contains specific comments on potential nominations from the current Tentative List. The second section provides suggestions for improving the current Tentative List to make it more representative of U.S. sites worthy of nomination to the World Heritage List and to provide a better framework for guiding future nominations.

The ACHP believes that the current Tentative List contains several excellent candidates for DOI to move forward with for the next several nomination cycles. In order for the U.S. to resume its leadership role in the World Heritage Program and to demonstrate support for the program, it is important that the U.S. regularly nominate properties on an annual basis. To that end, the ACHP recommends that DOI advance a nomination that is ready for this year and further develop some other potential nominations that warrant nomination but, in the ACHP's judgment, require additional work before they can go forward.

Potential Nominations from the Existing Tentative List

Wright (Frank Lloyd) Buildings

The ACHP believes that these influential masterpieces of modern architecture have had international impact and clearly warrant nomination as World Heritage Sites. It is our understanding that the documentation for this listing is well developed and the necessary owner consent has been obtained, so this group of outstanding buildings appears to be an excellent choice to move forward as the 2011 cultural nomination. We would recommend that the nomination be structured in such a way that it provides the World Heritage Committee with the option to not inscribe the entire series should it find an individual component lacking.

Civil Rights Movement Sites, Alabama (Dexter Avenue King Memorial Baptist Church, Montgomery; Bethel Baptist Church, Birmingham; 16th Street Baptist Church, Birmingham)

The civil rights movement in the United States undoubtedly has had a substantial global impact and, in our opinion, meets the World Heritage Convention standard of outstanding universal value. Appropriate sites associated with it would be a valuable addition to the World Heritage List as an important example of the universal struggle for human rights. However, the ACHP is concerned that the specific properties currently included on the Tentative List do not represent the best collection of examples, as the group does not include other recognized highly significant sites crucial to interpreting the civil rights movement, such as Central High School in Little Rock, Arkansas, the Selma to Montgomery March site in Alabama, or the National Mall site of Martin Luther King, Jr.'s 1963 "I Have A Dream" speech in Washington, D.C. The National Park Service has done substantial research on these sites and others that could form the basis for a strong and complete nomination. The ACHP believes that DOI should complete the necessary research and documentation to move a comprehensive Civil Rights Movement nomination forward in 2012. We believe it is particularly fitting for this Administration to advance such a nomination.

Dayton Aviation Sites, Ohio (Dayton Aviation Heritage National Historical Park, including Huffman Prairie (part of Wright-Patterson Air Force Base); Wright Cycle Company and Wright & Wright Printing, Dayton; Wright Hall (housing the Wright Flyer III), Dayton; Hawthorn Hill (Wright home), Dayton)

The ACHP believes that U.S. sites associated with the development of manned flight clearly have outstanding universal value and belong on the World Heritage List because of the exceptional impact on warfare, commerce, and transportation. However, like the preceding candidate, the current entry on the Tentative List should be reexamined to consider the inclusion of the site of the test flights at Kitty Hawk, North Carolina, and perhaps the original *Wright Flyer* aircraft itself. Careful consideration should also be given to whether Hawthorne Hill is a significant contributory site to a potential nomination. Nevertheless, the ACHP believes that the fundamental concept of the nomination is sound and, with some further refinement, could be a strong nomination.

San Antonio Franciscan Missions, Texas (Mission San Antonio de Valero (The Alamo), San Antonio Missions National Historic Park)

The ACHP believes that this group of mission buildings would fill a gap in listings from the United States; no such Spanish Colonial period property is currently listed as a World Heritage Site. Nomination of the missions would also present the U.S. with an opportunity to advance a joint cultural nomination with a neighboring country, as was done with the natural listing of Wrangell-St. Elias with Canada. There are similar and historically related mission sites in Mexico. About 50 missions were established in what is now Texas and Mexico. The ACHP recommends that DOI evaluate this notion, and, if it determines that

this group of mission sites can add a new dimension to the story told by the listed Mexican properties, consider a joint cross-border nomination with Mexico.

Jefferson (Thomas) Buildings, Virginia (Poplar Forest, Bedford County; Virginia State Capitol, Richmond. Proposed jointly as an extension to the World Heritage listing of Monticello and the University of Virginia Historic District)

Given the paucity of U.S. nominations since 1995, the ACHP believes that it is preferable to nominate new World Heritage Sites rather than to expand existing ones. That said, were DOI to pursue an extension of this listing, the expansion of the current Monticello/University of Virginia Historic District listing would add additional dimension to the architectural embodiment of Thomas Jefferson's vision. Adding the State Capitol would complement the previously listed residential and educational sites as the embodiment of his ideal governmental building. Poplar Forest, on the other hand, might not add significant value to the current listing. Therefore, we would recommend that this nomination be written in a way flexible enough that will allow the World Heritage Committee to list some or all of the proposed additions.

Mount Vernon, Virginia

The ACHP is aware that a previous nomination of Mount Vernon was considered to be deficient and was withdrawn from consideration. This would seem to indicate that the nomination would have to be reconsidered and recast to demonstrate this site's sufficiency to meet the standards for listing.

*Hopewell Ceremonial Earthworks, Ohio
Poverty Point National Monument and State Historic Site, Louisiana
Serpent Mound, Ohio*

While Cahokia Mounds State Historic Site and the three earthworks nominations are not of the same time period or cultural traditions, it does suggest that there be consideration for a nomination for the entire complex of Mississippi Valley earthworks as outstanding representatives of precontact cultures over time. Accordingly, DOI should consider including Effigy Mounds National Monument in such a nomination. Consideration should also be given to nomination of the entire complex of Hopewell sites, rather than separate nominations.

DOI should also consult with the Native peoples for whom all of these places still hold spiritual and cultural significance. Understanding this aspect of these special places will undoubtedly enrich the nominations but will also more accurately account for these values. This is especially important given that the "Filling the Gaps – an Action Plan for the Future" report identified a gap in these kinds of sites being inscribed and that the current tentative lists do not correct imbalances.

Additions to the Tentative List

The ACHP urges DOI not to simply consider additions submitted in response to this notice but rather to undertake a comprehensive and professional review of the current Tentative List to create one that truly represents those U.S. sites worthy of nomination to the World Heritage List.

The ACHP participated in the creation of the current list in 2006-2007 and believes that DOI should consider the lessons learned from that exercise to craft a sound and inclusive Tentative List that can guide U.S. nominations on an annual basis for a number of years to come.

The primary shortcoming with the current Tentative List is that the last update relied solely on the initiative of the general public to suggest sites. There is no question that the views of the public and those parties who manage potential U.S. World Heritage Sites are an important and valuable contribution to the compilation of the Tentative List. Indeed, the ACHP commends DOI for its outreach and would urge that the public and site managers be included throughout the process of updating the Tentative List.

However, this approach, which relies on the motivations and evaluations of individuals, needs to be integrated with a professional analysis of the U.S. cultural heritage that the World Heritage listing process and the Convention envision. The ACHP recommends that DOI use the responses to the current notice as the point of departure for a more comprehensive revision of the Tentative List.

To achieve this goal, DOI should consider both process and content. As to process, the ACHP believes it is essential to complement the public outreach efforts already taken with a professional assessment of potential U.S. World Heritage Sites. This effort should be led by DOI and the designated consultant agencies but should engage experts in academic disciplines and cultural resource professionals. A true public-private partnership would serve to produce the best outcome and should be fully participatory for the national historic preservation community and the public. A carefully conceived initiative could draw on professional expertise, public sentiment, and the views of site managers and owners.

With the upcoming 40th anniversary of the Convention next year, the opportunity to conduct a national dialogue could not only produce an excellent Tentative List but, perhaps as importantly, serve to publicize the World Heritage Program and raise the level of public understanding and engagement for the future. Consideration should be given to using the 2012 US/ICOMOS annual symposium, which has the World Heritage Convention at 40 as its theme and is being co-sponsored by the National Park Service, as a component of this process. DOI should also consider using its partnership with US/ICOMOS and other national preservation organizations to facilitate the Tentative List revision process.

As to substance, DOI should give careful consideration to those aspects of the U.S. cultural heritage that have made outstanding contributions to the global heritage. It should also be guided by the guidance provided by the ICOMOS study entitled: "The World Heritage List, Filling the Gaps – an Action Plan for the Future," which identifies areas in the current World Heritage List that are underrepresented. Some examples that immediately come to mind follow.

While the U.S. as a nation is quite young in comparison with other cultures, there are numerous areas of our national patrimony that represent significant global contributions. Space exploration, as represented by NASA sites and vehicles, immediately comes to mind. Another topic could be the development of nuclear energy as exemplified by sites of the Manhattan Project.

Engineering achievements like the Interstate Highway System, which is one of the largest public works systems ever built and has transformed contemporary society, as well as the mass production of the automobile and associated sites and objects, could be considered. Other thematic topics include the migration patterns in the U.S. from westward expansion to the mass migration of African Americans from the rural south to industrialized cities in the north. Sites associated with the movie industry, or more broadly, the entertainment industry (television, Broadway, and music) and its influence on world culture might be explored.

In addition, the topic of U.S. invention in general takes into account the World Heritage Convention standard of outstanding universal value. To that end, industrial mass production of the automobile, development of the skyscraper, transformational inventions like the electric light, the telephone, and the computer are other themes that warrant further consideration. A comprehensive scholarly analysis, coupled with a national public dialogue, could produce a truly representative U.S. Tentative List and

significantly raise public awareness of and support for heritage conservation in the U.S.

In closing, the ACHP applauds DOI's initiation of this process and looks forward to assisting in the finalization of nominations over the next few years as well as participating actively in a more comprehensive revision of the Tentative List. These efforts will not only provide recognition to those exceptional American sites that contribute to the universal heritage of humankind but can also contribute to advancing U.S. foreign policy goals through an important public diplomacy initiative.

Sincerely yours,

A handwritten signature in blue ink, reading "John M. Fowler". The signature is written in a cursive style with a light blue background behind it.

John M. Fowler
Executive Director