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June 23, 2023

Jonathan Putnam
Office of International Affairs
National Park Service
1849 C St., N.W., Room 2415
Washington, D.C. 20240

Dear Mr. Putnam:

The comments that follow are those of World Heritage USA, and are submitted in response to your *Federal Register* Notice of June 7, 2023 soliciting public comments on the next potential nominations from the US World Heritage Tentative List to UNESCO for possible future inscription onto the World Heritage List.

World Heritage USA is a privately funded nonprofit organization that is part of a worldwide network of people, institutions, government agencies, and private corporations that support the conservation of the world's heritage. A principal focus of our domestic work is advocacy in support of existing and potential U.S. World Heritage sites, which also advances the standing of the U.S. in the global World Heritage community.

Of the nineteen US sites on the Tentative List at present, we have previously expressed our full support for the Hopewell Ceremonial Earthworks (OH) and for the Moravian Bethlehem District (PA), both of which are presently pending approval by the World Heritage Committee, at different stages in the process.

Above all the others on the US Tentative List at present, we strongly support making the US Civil Rights Movement Sites serial nomination the next official US nomination to the World Heritage Committee, presumably by January 2024.

In order for that to happen, OIA/NPS must immediately give its official approval, via contract or other agreement, for the World Heritage Initiative

based at Georgia State University to complete the nomination dossier that they have been researching and assembling, with a team of experts historians, for nearly eight years.

In addition, it is imperative that OIA/NPS affirm and forward to the WHC and ICOMOS, all of the additional ten (10) critical Civil Rights Movement sites that were include in the draft dossier provided to you previously, for formal addition to the US Tentative List. Eight (8) of these ten proposed additions to the US Tentative List are already designated as US National Historic Landmarks (NHL), affirming their national significance. Further, seven of these eight sites comprise all or a portion of units of the national park system, further assuring their permanent preservation. We also encourage strong consideration to including sites that were also part of the US Supreme Court landmark 1954 *Brown v. Board of Education* decision, in South Carolina, Delaware and the District of Columbia.

Two of the proposed Tentative List sites, the Woolworth Department Store Lunch Counter (NC), and the Lorraine Motel (TN) have pending nominations as NHL, which we believe will be readily confirmed when the official NHL Committee is reformed later this year.

Overall, we are appreciative of the OIA/NPS for transmitting the draft dossier prepared by the Georgia State World Heritage Initiative team to ICOMOS and requesting the standard upstream review. We are also fully supportive of the proposed visit later this summer to the US Civil Rights sites by an expert review delegation from ICOMOS, for which we have made a significant financial contribution.

We are pleased to see that so much work has already been done to prepare for the US Civil Right Movement Serial Nomination and believe that it is the best site on the US Tentative List that should be fully prepared for a 2024 official nomination by the USA.

In addition to a 2024 nomination, we also strongly support a nomination for the Okefenokee National Wildlife Refuge by January 2025. We know that substantial work has already been done on the dossier. We are hopeful that as the United States reengages with UNESCO, including paying our dues to the World Heritage Committee, the United States will be able to forward more than one nomination per year, possibly as early as 2024.

Looking beyond 2025, we urge OIA/NPS to work closely with its sister federal agencies, especially NOAA, to organize preparation of the necessary documentation in order to bring forward the nominations of the four Pacific Ocean sites from the US Tentative List, specifically, the California Current Conservation Complex, Marianas Trench National Monument, National Marine Sanctuary of American Samoa, and the Pacific Remote Islands complex.

Giving our full attention to these important Pacific Sites over the next few years will bring useful attention to these special places and cultures just at a time when the US government is placing greater emphasis on the strategic values of the Pacific Ocean and its environs. Such “soft diplomacy” as World Heritage inscription brings can form an essential complement to any other initiatives in the region.

We greatly appreciate this opportunity to offer our recommendations for your next critical steps in official support for the World Heritage Program in the USA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Douglas C. Comer', with a long horizontal stroke extending to the right.

Douglas C. Comer
President