March 7, 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

Submitted via www.regulations.gov

Re: The American Conservation and Stewardship Atlas  

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

Thank you for the opportunity to share our insights and perspective regarding the America the Beautiful Initiative and the corresponding American Conservation and Stewardship Atlas (Atlas). We appreciate your leadership on this nationwide effort to conserve and protect 30 percent of America’s lands and waters by 2030.

Interests of the National Trust for Historic Preservation

The National Trust for Historic Preservation is a privately-funded charitable, educational, and nonprofit organization chartered by Congress in 1949 to “facilitate public participation in historic preservation” and to further the purposes of federal historic preservation laws. The intent of Congress was for the National Trust “to mobilize and coordinate public interest, participation, and resources in the preservation and interpretation of sites and buildings.” With headquarters in Washington, D.C., 28 historic sites, more than one million members and supporters, and a national network of partners in states, territories, and the District of Columbia, the National Trust works to save America’s historic places and advocates for historic preservation as a fundamental value in programs and policies at all levels of government.

As a national leader of the historic preservation movement, the National Trust will continue engagement with preservation partners on implementation of the America the Beautiful initiative and the closely related component of developing an Atlas documenting conservation and preservation efforts. A key contribution to this effort includes listening sessions hosted by the Advisory Council on Historic Preservation (ACHP) that provided an opportunity for dialogue and input amongst the preservation community, allowing for valuable insights to be shared with the interagency working group. We write to share select highlights and recommendations emerging from that process.

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1 54 U.S.C. §§ 320101, 312102
Natural Landscapes are Intertwined with Cultural Landscapes

The National Trust concurs with a key theme of the recent listening sessions, which noted that landscapes across our nation inherently contain both cultural and natural values and are inextricably linked as a result of thousands of years of human habitation. We applaud President Biden’s recent Executive Proclamation to restore the Bears Ears National Monument, a naturally and culturally significant landscape exemplifying the simultaneous conservation and preservation of irreplaceable natural and cultural resources.

As the Administration considers a framework for the Atlas and begins implementation of the initiative, we encourage robust consideration for historic preservation and the inclusion—and explicit mention of—cultural values within those public resources. As noted in feedback received at the ACHP-held listening sessions, a conservation strategy should consider a number of property types such as historic cemeteries, battlefields, and historic buildings that are important components of our nation’s cultural stewardship. Such an approach would provide a comprehensive database representing the reality of intertwined natural and cultural resources in landscapes and communities across the country.

Cultural Resource Digitization Enhances Conservation

Inclusion of cultural resources in the Atlas is an opportunity to provide a more comprehensive assessment of conservation and preservation priorities amongst the vast array of lands and sites in the United States. The National Trust has strongly supported efforts to digitize cultural resources. Digitizing and standardizing data as part of the Atlas project would provide a useful resource that allows consideration of cultural resources early in federal agency and other planning processes to inform decisions, reduce potential conflicts with cultural resources, and facilitate more efficient planning and project implementation.

Comprehensive and landscape-level datasets enable federal agency and other planners to engage in assessments prior to initiating large scale projects rather than at later stages, increasing the ability to avoid disruptions to sensitive resources or project implementation. One example of cultural resource digitization is the National Cultural Resources Information Management System (NCRIMS), utilized by the Bureau of Land Management (BLM). This collaboration with State Historic Preservation Offices (SHPOs) is one of the nation’s most innovative programs and conservation success stories to supportpredictive modeling and data analysis to enhance planning for large-scale, cross-jurisdictional land-use projects. We encourage the consideration of examples such as these during development of the Atlas to help develop a digital database that contributes to a long-term effort that will assist with the conservation and preservation of vital resources.

Recognizing Tribal and Native Hawaiian Voices

We deeply appreciate the Administration’s commitment to acknowledging and uplifting the unparalleled knowledge and expertise of Tribes and Native Hawaiians with regard to their ancestral lands. Tribal and Native Hawaiian voices have consistently been overlooked in conservation and preservation discussions, even when ancestral lands and their natural and cultural values were the subject of consideration. We echo the feedback from the ACHP listening sessions where participants noted the importance of consulting with, and valuing, the expertise of Tribes and Native Hawaiians and incorporating Indigenous Knowledge (IK) in any science-based approaches to conservation and preservation. Listening to local communities, including Indian Tribes and Native Hawaiians, regarding the resources they value is critical due to their intimate knowledge of the natural and cultural resources of their communities.
Preservation, Conservation, and Climate Change

With enhanced mapping of historic properties, cultural sites, and natural landscapes, we will improve the resiliency and long-term protection of cultural resources threatened by climate change. In addition to working with state, local, and Tribal governments, as well as private landowners and other interested stakeholders as directed in Executive Order 14008 (Tackling the Climate Crisis at Home and Abroad), we urge the Administration to continue to consult with the nonprofit sector, including the National Trust, to help set conservation priorities.

One example of collaboration between conservation and preservation organizations in the nonprofit sector is the Chesapeake Conservation Partnership (CCP), a large landscape collaborative that includes more than 80 federal and state agencies, Tribes, land trusts, and other non-profit organizations—including the National Trust—committed to land conservation and cultural heritage protection in the Chesapeake watershed. The CCP has worked to develop metrics that prioritize conservation efforts that protect multiple resource values, such as agricultural lands, lands important for habitat, as well as landscapes with significant cultural resource values. A similar approach, working together with existing large landscape conservation partnerships like the CCP, could help guide the Administration’s approach to meeting the 30 percent conservation goal.

Thank you for your consideration of our views. We look forward to additional dialogue and collaboration during the development and implementation of this initiative.

Sincerely,

Pam Bowman
Senior Director, Public Lands Policy
National Trust for Historic Preservation