

September 20, 2022

Submitted via electronic mail and U.S. Mail

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Shannon Estenoz
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Re: Please Nominate Okefenokee National Wildlife Refuge to the UNESCO World Heritage List

Dear Secretary Haaland and Assistant Secretary Estenoz:

We, the 33 undersigned organizations, write to respectfully ask you to authorize the nomination of Okefenokee National Wildlife Refuge to the United Nations Educational, Scientific, and Cultural Organization's (UNESCO) World Heritage List. Okefenokee is a world-class natural site, known globally for its pristine wetlands and vast diversity of flora and fauna. Nomination and inscription on the World Heritage List would solidify recognition of Okefenokee's global significance and bring immense economic and conservation benefits to the Southeast.

Inscription would also be consistent with President Biden's 30x30 initiative and America the Beautiful Campaign to conserve vital lands and waters across the country. However, Okefenokee cannot begin its bid for World Heritage status until the United States formally nominates it to the World Heritage List.

Okefenokee is in prime position for a successful World Heritage nomination. It is already on the U.S. Tentative List, a prerequisite for nomination, and knowledgeable UNESCO experts opine that it is a compelling candidate for inscription. Additionally, the U.S. Fish and Wildlife Service actively supports nominating Okefenokee and has partnered with the nonprofit Okefenokee Swamp Park to successfully assemble experts to support the nomination, raise funding, and garner local support.

All that is needed to begin preparing Okefenokee's formal World Heritage nomination is authorization from Assistant Secretary Estenoz and the Department of the Interior.

For these reasons, we respectfully ask that you authorize the U.S. Fish and Wildlife Service to begin preparing a World Heritage nomination dossier for Okefenokee National Wildlife Refuge. Enclosed, we provide a brief primer on Okefenokee's

pursuit of World Heritage Inscription, including a detailed timeline of the most recent developments. If you have any questions about this letter, please contact Elise Bennett at ebennett@biologicaldiversity.org or (727) 755-6950. For more information about the Okefenokee UNESCO bid, please contact Kim Bednarek at kim.bednarek@okeswamp.org (904) 207-8057.

Sincerely,

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THE OKEFENOKEE'S QUEST FOR WORLD HERITAGE INSCRIPTION

Securing a resilient and prosperous future for the Okefenokee region

Summary

Nomination and inscription on the World Heritage List is the highest honor in the world for sites of cultural and ecological importance. Okefenokee National Wildlife Refuge (NWR) contains ecological features of Outstanding Universal Value that warrant recognition on the World Heritage List, which would bring immense economic and conservation benefits to the Okefenokee and surrounding communities. But Okefenokee NWR cannot gain global recognition as a World Heritage Site until the U.S. Department of the Interior “greenlights” the Refuge to prepare and submit a nomination to the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Centre. The Okefenokee and its partners have made enormous strides to present Okefenokee to the world stage, yet it has not received the “greenlight” to prepare a formal nomination dossier. A “pull from the top” (as has occurred in the past with the Papahānaumokuākea UNESCO site in Hawaii) may be required to catalyze a more rigorous bid process and ensure a chance for the Okefenokee NWR to be considered as a World Heritage site in the coming several years.

What is World Heritage?

The United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage (WH) List is an international list of cultural and natural properties nominated by the signatories to the WH Convention (1972) for their Outstanding Universal Value.¹ The WH Committee, composed of representatives from 21 nations elected as the governing body of the WH Convention, makes the final decisions on which nominations to accept on the WH List at its annual meeting each summer. Although the United States is not a member of UNESCO, it continues to participate in the WH Convention, which is an independent treaty. There are 1,154 WH sites in 167 of the 194 signatory countries. The United States has 24 sites inscribed on the WH List. World Heritage sites often become a significant attraction for tourists and help to develop the tourism industry of the locality or country.

What is the Tentative List?

The UNESCO WH Committee requires each signatory country to the UNESCO WH Convention² to prepare a Tentative List of properties that the country believes meet the criteria for UNESCO WH listing and from which that country may make nominations. Only properties included on the U.S. Tentative List are eligible for nomination by the Department of the Interior (DOI). Inclusion on the Tentative List does not, however, guarantee future nomination.³

Why the Okefenokee?

Okefenokee NWR boasts a wetlands footprint largely undisturbed since prehistoric times, hosts significant stores of sequestered carbon, and is home to an exceptionally diverse and abundant array of flora and fauna, which rely on a unique balance of natural water cycles and fire to thrive. Yet the Okefenokee NWR faces several stark environmental threats to its peatlands and sustainable hydrology. Uncontrolled wildfires (as distinct from essential managed fires) are a threat to the Okefenokee NWR and its contiguous property owners, as are the activities of extractive industries on the Okefenokee NWR's

¹ As measured against 10 criteria (six of which are used to judge potential cultural sites and four of which are used to assess potential natural sites, like the Okefenokee).

² The U.S. is not a member state of UNESCO since departure at the end of 2018 but continues to be a State Party to the World Heritage Convention. The departure of the U.S. from UNESCO is not a formal obstacle to any possible World Heritage nomination.

³ Neither inclusion in the Tentative List nor inscription as a World Heritage Site imposes legal restrictions on owners or neighbors of sites, nor does it give the United Nations any management authority or ownership rights in U.S. World Heritage Sites, which continue to be subject to U.S. laws.



doorstep. Communities around the Okefenokee NWR are also facing difficult circumstances, with residents seeking to build meaningful lives despite persistent economic uncertainty in rural South Georgia. UNESCO WH inscription holds the potential to strengthen this global natural resource in ways that support the development and execution of our principal initiatives: support education & vocational training; develop & manage scientific programs; expand recreation & ecotourism; support climate resilience; and create a communication & safety infrastructure around the Okefenokee NWR.

How did the Okefenokee get onto the Tentative List?

Decisions on properties to include on the Tentative List are made, after considering public comments, by the Assistant Secretary of the Interior for Fish and Wildlife and Parks. The Okefenokee NWR has remained on the U.S. Tentative List for 40 years (since 1982), including through the two formal reassessment periods in 2007 and 2017 during which the Okefenokee NWR presented extensive materials, advice of a wide range of subject-matter experts, and public commentary supporting its continued inclusion on the list. The properties added in 2008 were selected from among those that submitted voluntary applications; those added in 2017 were identified by an expert Working Group established as a sub-committee of the U.S. National Commission for UNESCO, a Federal Advisory Committee for the U.S. Department of State. Today, the Okefenokee NWR remains on the U.S. Tentative list alongside a number of other U.S. natural sites, including Big Bend National Park, Texas; Central California Current, California (consisting of a combination of marine sanctuaries, national seashores and recreation areas); the Marianas Trench National Monument, U.S. Territory, Commonwealth of the Northern Mariana Islands, Guam; the National Marine Sanctuary of American Samoa/Rose Atoll National Marine Monument (Formerly Fagatele Bay National Marine Sanctuary); the Pacific Remote Islands National Monument, U.S. Territorial Waters; the Petrified Forest National Park, Arizona; and the White Sands National Monument, New Mexico.

The Federal Interagency Panel on WH recommends to the Assistant Secretary for Fish and Wildlife and Parks which sites should be authorized to prepare nomination packages. Bryan Arroyo currently represents the U.S. Fish and Wildlife Service on the Panel and supports the nomination of Okefenokee NWR to the UNESCO WH List.

How and when does a country submit a nomination package to the World Heritage Committee?

The current rules of the WH Committee limit countries to one nomination per year, though the U.S. does not make nominations every year. Specifically, before a formal WH site dossier and nomination package can be prepared for UNESCO submission, the site must be authorized by the Assistant Secretary for Fish and Wildlife and Parks, Shannon Estenoz, who reports to the Secretary of the Department of the Interior, Debra Haaland. Indeed, U.S. nominations are made at the discretion of the Assistant Secretary of the Interior for Fish and Wildlife and Parks, and there is no fixed schedule for doing so. Ultimately, the Assistant Secretary, with advice from the Federal Interagency Panel on WH, considers a number of factors in identifying properties for formal nomination.⁴ Bryan Arroyo currently represents the U.S. Fish and Wildlife Service on the Panel and supports the nomination of Okefenokee NWR to the UNESCO WH List.

Moving forward from the Tentative List (“the Greenlight”)

Yet even before a site is formally introduced to the Assistant Secretary, the U.S. has developed an informal “greenlight” process by which sites on the Tentative List remain in a holding pattern until a further benchmark is met -- namely recommendation by the Office of International Affairs (OIA) of the

⁴ One current factor is the statutory prohibition, in place since 2011, on the U.S. paying dues to UNESCO or the World Heritage Fund. This situation has created considerable uncertainty about the U.S.’s ability to continue to make World Heritage nominations. While Congress has recently appropriated an amount of funds to pay a portion of the UNESCO dues, a waiver may be required to get those funds released to UNESCO.



National Park Service (NPS). That agency has considerable knowledge of the potential cultural and natural sites (as many of the sites are National Parks or properties) and develops a dialogue with sites such as the Okefenokee NWR to assess how ready is a site to move forward more formally. OIA has periodic meetings with the Assistant Secretary and its recommendation to the Assistant Secretary constitutes an additional filtering process to ensure potential sites are ready to begin the formal journey toward UNESCO inscription.

History of the Okefenokee NWR’s Tentative List and Greenlight Process

Date	Event	Outcome
1982	The Okefenokee NWR originally identified as a potential WH site	The Okefenokee NWR remains on this list for 25 years, as dozens of U.S. natural site packages are prepared, nominated, and approved
2007	U.S. cultural and natural sites, formerly identified as candidates, are requested to resubmit applications to become a part of the official U.S. Tentative List	The Okefenokee NWR prepares extensive research and community endorsement supporting its unique biological processes and vast diversity of wildlife
2008	The DOI announces its official U.S. Tentative List in January 2008	The Okefenokee NWR is allowed to remain on the U.S. Tentative List
2017-2018	U.S. cultural and natural sites requested to resubmit applications to remain part of the official U.S. Tentative List	The Okefenokee NWR prepares extensive research supporting its unique biological processes and vast diversity of wildlife
2017-2018	U.S. cultural and natural sites requested to resubmit applications to remain part of the official U.S. Tentative List	Tilman Jaeger, UNESCO Advisor and Expert on eligibility of natural sites, visits refuge with OIA’s Jonathan Putnam to opine on Okefenokee NWR attributes/qualifications for Outstanding Universal Value
2018	U.S. cultural and natural sites requested to resubmit applications to remain part of the official U.S. Tentative List	The Okefenokee NWR is allowed to remain on the U.S. Tentative List
August 2021	501(c)(3), OSP, Inc. partners with USFWS and is authorized to lead a Project Management Office (PMO) to propel the UNESCO bid further - from Tentative List – to “Queue” - to Formal Nomination	The PMO initiates work to attain a “greenlight” to join “the queue” from the Assistant Secretary of Fish, Wildlife and Parks
November 2021	The OIA meets with the Assistant Secretary to Discuss moving the Okefenokee NWR from Tentative List to the “Queue” representing a more active dossier preparation state	The OIA notifies the Okefenokee NWR that it is not yet convinced the Okefenokee NWR is ready to begin active work on the nomination package

After the Okefenokee NWR and partners formed a PMO in August 2021 to direct a credible and well-funded UNESCO bid, the PMO established and has proceeded with the following objectives:

- 1) Engage with the community actively and transparently to communicate the implications and benefits of a WH nomination.
- 2) Build a credible and consistent WH nomination narrative for all communication purposes, including a dedicated WH website - <https://okefenokeeworldheritage.org/>
- 3) Establish a platform for dialogue with key actors and stakeholders.
- 4) Establish a technical working group (the PMO) for the elaboration of the nomination dossier, including scientific and UNESCO experts.
- 5) Identifying and engaging prominent “champions” of a prospective WH nomination – community scientific, and political in background.



- 6) Invest in high quality mapping and overall visual attractiveness of the nomination dossier.
- 7) Continue fundraising and community engagement.
- 8) Refine and build upon the Comparative Analysis discussion and research framework, working with scientific and UNESCO experts to highlight the strongest possible case for Outstanding Universal Value.

Toward these objectives, the PMO has achieved the following milestones as it builds community engagement, scientific support, and funding for the bid. These milestones include:

September-October 2021: Engaged U.S. WH candidates and sites to understand the process, cost, and timeline of a bid.

From September 2021 to October 2021, at OIA’s recommendation, the PMO met with selected U.S. sites on the tentative list and/or those recently inscribed on the WH List, to discuss budgeting, timelines, and lessons learned. Prior to a November 2021 meeting between OIA and the Assistant Secretary, the PMO organized a virtual roundtable with selected U.S. WH sites and OIA to share experiences. The OIA’s November 2021 meeting did not result in a greenlight for the Okefenokee NWR to move from the Tentative List to “the Queue.”

December 2021 – Present: Assembling a dedicated pool of scientific and UNESCO World Heritage Experts.

The PMO built an impressive pool of scientific experts -- including initiating and maintaining a vigorous dialogue with UNESCO experts, Cyril Kormos and Tilman Jaeger. The active and enthusiastic scientific pool now encompasses notable experts in global wetland and peatland ecology, biogeophysics and hydrology, longleaf pine habitats, and flora and fauna - including plants, birds, mammals, herpetofauna, and invasive species.

December 2021 - Present: Editing, rewriting, and expanding a draft dossier and related evidence for Outstanding Universal Value.

The PMO continues to work developing and elaborating content on comparable sites around the world (and the Okefenokee NWR’s ability to compare favorably with those sites). This work involves active engagement with the PMO’s pool of experts and a unique partnership with a technical writing seminar at the University of Georgia School of Law. Law students drafted several statements of Outstanding Universal Value that synthesized what is now more than 200 pages of scientific material on the Okefenokee NWR, including original and contributed scientific research and the opinions of the UNESCO experts consulted to date. The PMO’s work also involves incorporating professional mapping designed to add attractive and informative visuals to the draft dossier. Although the dossier does not become final until it goes to press shortly before submission to UNESCO (at least two years after receiving a formal greenlight from the Assistant Secretary), the draft dossier remains a repository of the significant research that has been compiled to support the Okefenokee NWR’s bid.

March 2022: Raising UNESCO-dedicated funds to support the bid process

OSP, Inc. — the non-profit partner and fiduciary — reached an initial milestone of \$60,000 raised, moving toward an ultimate goal of \$500,000. This funding may be used for research, writing, mapping, photos, editing and/or donations (including to UNESCO) that might be required to facilitate the consideration of and approval of the Okefenokee NWR as a WH site.

April 2022: Okefenokee NWR-UNESCO Website

OSP, Inc. and the PMO launched an initial website designed to publicize and educate the public about the Okefenokee NWR bid for WH status.



April 2022: Convening the first Okefenokee Virtual Experts Summit

The PMO convened the first Okefenokee NWR-UNESCO Virtual Experts Meeting including scientific and UNESCO experts, the OIA, and numerous community supporters, in attendance. Following five months of parallel academic work and vigorous debate during this Experts Meeting, the group arrived at working theses addressing two of the possible four UNESCO Criteria (a site need only prove one Criterion for inscription). The primary Criteria under consideration are Criterion ix - unique biological processes and Criterion x –wildlife diversity. UNESCO experts opined that the theses for these Criteria “make a good story” and that these types of “composite” arguments have historically been “compelling” to UNESCO. In addition, numerous experts weighed in with support to nominate Okefenokee NWR under a third natural site Criterion, Criterion vii –exceptional natural beauty. Others supported seriously investigating Criterion viii –an example of unique geological processes. While the latter Criterion is not considered likely to hold up under analysis, the PMO is investigating its validity with experts. On the other hand, Criterion vii – exceptional beauty - is a simple case to make – albeit highly subjective when it comes to evaluation by the WH Committee, who see many exquisite locations throughout the world. That said, the experts believe there is little downside in making the case for Criterion vii, given the bulk of our argument rests on Criteria ix and x (biological processes and wildlife diversity).

June 2022: Press Release

With the support of Southeast Regional Director Leopoldo Miranda-Castro of the U.S. Fish and Wildlife Service, the OSP, Inc. completed a press release announcing the public-private partnership that is behind the Okefenokee UNESCO bid and explaining the purpose of the work for public consumption.

In short, the considerable work that has been assembled over the past decade – and particularly the past four months – reveals that the Okefenokee NWR’s long wait on the Tentative List is justified and a rigorous bid process will provide an opportunity for the Okefenokee NWR to be considered by UNESCO as a World Heritage site in the coming years. This process will be a lynchpin for building an interdependent and resilient economic development model, one in which non-profit educational institutions, the private sector, and government work collaboratively through the prism of one of the world’s great natural resources, the Okefenokee.



For further information on the Okefenokee-UNESCO bid:

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