### Sulaiman-Too (Kyrgyzstan)

No 1230 rev

Official name as proposed by the State Party: The Sulaiman-Too Sacred Mountain

Location: The Osh Oblast

**Brief description:**

Sulaiman-Too mountain dominates the surrounding landscape of the Fergana Valley and forms the backdrop to the city of Osh. In medieval times Osh was one of the largest cities of the fertile Fergana valley at the crossroads of important routes on the Central Asian Silk Roads system.

For more than a millennium and a half Sulaiman-Too was a beacon for travellers along the Silk Roads and has been revered as a sacred mountain. Its five peaks and slopes contain a large assembly of ancient cult places and caves with petroglyphs, all interconnected with a network of ancient paths, as well as later mosques. Its veneration now blends pre-Islamic and Islamic beliefs.

Most of the nominated property is a relict landscape little used, although the first peak with some caves, and the lower parts of the southern slopes of the second and third peaks, are ritual sites frequented by pilgrims and tourists.

**Category of property:**

In terms of the categories of cultural property set out in Article 1 of the 1972 World Heritage Convention, this is a site. In terms of the Operational Guidelines for the Implementation of the World Heritage Convention (January 2008) paragraph 47, it is also nominated as a cultural landscape.

### 1. BASIC DATA

**Included in the Tentative List:** 29 January 2001

**International Assistance from the World Heritage Fund for preparing the Nomination:** 1st October 2007

**Date received by the World Heritage Centre:** 30 January 2006

**1st February 2008**

**Background:** This is a referred back nomination (31 COM, Christchurch, 2007 and 32 COM, Quebec, 2008).

A first nomination dossier for Sulaiman-Too Cultural Landscape (Sacred Mountain) was examined by the World Heritage Committee at its 31st session (Christchurch, 2007).

The World Heritage Committee adopted the following decision (31 COM 8B.27):

The World Heritage Committee,

1. Having examined Documents WHC-07/31.COM/8B and WHC-07/31.COM/INF.8B.1,

2. Refers the nomination of Sulaiman-Too Cultural Landscape (Sacred Mountain), Kyrgyzstan, back to the State Party to allow it to:

   a) Complete the Management Plan.

   b) Complete the protection of the nominated property by incorporating the zone of planning control and zone of protected natural setting into the city plan to give it effect, and in order to preclude new interventions on the mountain, including tree planting.

   c) Extend the Buffer Zone to incorporate part of the adjoining unbuilt plain as a means of protecting the setting of Sulaiman-Too.

   d) Consider how sites on the neighbouring peaks might be incorporated in a revised buffer zone.

   e) Complete the survey of the network of paths around the mountain.

   f) Put in place a Tourism Strategy which addresses the issues of visitor access.

3. Recommends that the name of the property be changed to ‘Sulaiman-Too Sacred Mountain’.

On 1st February 2008 the State Party submitted a Management Plan and supplementary information on development pressures and protection. This information was incorporated into an evaluation report considered by the World Heritage Committee at its 32nd session (Quebec, 2008). In this report, ICOMOS recommended the nomination be referred back to the State Party to allow it to:

- Stop the construction of an aerial ropeway, suspend and then revise the project for a new mosque to reduce its height and impact, and find alternative solutions to the need for more houses in the buffer zone to avoid high-rise buildings;
- Create a Site Management Council to implement the Management Plan, and augment the Plan with an Action Plan;
- Put in place the formal protection of the nominated site through incorporating it and the Buffer Zone into the city plan to give both of them effect as part of the overall zoning plan for the city, through finalising the Protection Zoning Project document as part of the Urban Master Plan.

This recommendation was adopted by the Committee.

On 1st February 2009, the State Party submitted supplementary information related to the requests of the Committee. This information is incorporated into this report.
**2. THE PROPERTY**

**Description**

The Sulaiman-Too Mountain is located in the eastern part of the fertile Ferghana Valley, on the banks of the Ak-Buura River, at the foot of the Kichi-Alai ridge.

The mountain overshadows the city of Osh, for centuries the largest city in the Ferghana valley and at the cross-roads of important routes along the Central Asian Silk roads. Sulaiman-Too possesses a large concentration of cult objects – shrines and petroglyphs – as well as later mosques, and is respected as a sacred mountain blending pre-Islamic and Islamic beliefs, a veneration which could date back to the Bronze Age.

The Osh oasis is identified with ancient Davan, where it was recorded in the 2nd – 1st century BC that the Chinese mounted campaigns to obtain “heavenly” horses for military use. The petroglyphs of Sulaiman-Too, and in particular those of Surottuu-Tash display a collection of images, dating from the Iron Age and later, which are said to bear resemblance to the heavenly horses of Davan.

Sulaiman-Too rises to around 200 metres and dominates the surrounding plain. On three sides it is now surrounded by the city of Osh. The nominated property extends to a maximum of 1,663 metres by 820 metres and on its north-east, east and southern sides. It is surrounded by a buffer zone encompassing some of the city, the plain to the north and west extending to Orto-Too, and the peaks of Surottuu-Tash. The nominated area is 112 ha and the buffer zone is 4,788 ha.

Sulaiman-Too has five peaks. Its current name first appeared in the 18th century and relates to a Muslim legend of the stay on the mountain by the Prophet Sulaiman, the biblical Solomon. Prior to that the mountain had been known by a variety of different names (see History below).

The mountain was formed during the Pleistocene-Holocene period when pressure from the Indian plate on the Asian continent squeezed and lifted up the Palaeozoic basement rocks over the younger rocks. This lifting is still in process with an average annual raise of 6 mm. Some of the peaks are highly fractured slates and schist with long smooth inclines, while others are weathered karst limestone with niches and caves of various forms and sizes which have been used since the Stone Age.

The five peaks and the mountain slopes contain remains of ancient cult places and several caves with petroglyphs dating from the Neolithic to the late Middle Ages, all interconnected with a network of still legible traces of ancient paths. The first peak with caves, and the lower parts of the southern slopes of the second and third peaks, are frequented by pilgrims and tourists, as are three Islamic monuments.

In the Middle Ages irrigation channels from the Ak-Buura River were created along the lower slopes, and one of them is still functioning on the northern side. In Soviet times further active irrigation measures were undertaken with the installation of iron water pipes to support a plantation of non-indigenous *karagach*-trees (a type of elm) on the lower parts of its southern and western slopes.

At the north-east, north and north-west foot of the mountain are modernised vernacular houses, providing accommodation and ritual services for pilgrims. At the eastern end of the nominated property is a public garden and modern buildings related to the site museum complex, TV centre, and tourist services. There are several new structures related to the ritual services for pilgrims near one of the mosques, the Ravat-Abdullakhan, and a large museum in the main cave. At the western extremity of the nominated property, near the foot of the mountain, there is an active frontier post of barracks and houses established in Soviet times. Also dating from the same period are the modern visitor path (partly overlapping the earlier pilgrim path), an observation platform on the top of the first peak, a TV antenna on the top of the second peak, and still active military barracks and apartment houses near the western foot of the mountain.

The key aspects of the nominated property are:

- Stone & Bronze Age settlements
- Rock engravings - petroglyphs
- Ritual sites
- Network of paths
- Islamic buildings
- Museum

These are considered in turn:

**Stone & Bronze Age settlements**

The Stone Age remains in the Rusha-Unkur cave on the mountain’s third peak, were discovered in the 1940s and 1950s and date to Neolithic times. Further explorations in
many 2000 and 2004 did not reveal any new early sites, thereby confirming the conclusions of former researchers that habitation by ancient people in the Stone Age was only occasional.

A Bronze Age settlement was located on the steep southern slope of the third peak, a site apparently chosen for its defensive properties. The remains are related to the Chust culture, which extended over large parts of the Fergana valley, and for which over 50 river sides sites are known. The Sulaiman-Too settlement of over 2 ha in extent had a terrace layout, with fifteen terraces overlaying one another. The remains of thirteen buildings have been found, half dug-out in form with framed walls and a wooden roof. Analysis of the material remains, also confirmed by radiocarbon dates, shows the site belonged to the 15th-7th century BC. The Osh settlement is set apart from other lowland sites by its mountain top location and by the wealth of painted ceramic finds. It has been suggested that this settlement might have had ritual associations.

**Rock engravings – petroglyphs**

Petroglyphs are found on and around all the five peaks and also in caves, shelters and karstic tunnels, on horizontal, vertical and inclined planes. During 2005, the images were documented and 101 sites indexed.

The petroglyphs were engraved using both stone and metal tools. They can be conditionally divided into three groups: anthropomorphic, zoomorphous and geometrical signs. The most numerous group includes images of solar signs and webs. The animal images are in the minority but include a realistic group of three horses lassoed by a man standing at a distance, snakes with open mouths, predatory birds and goats with bent horns, some of them with their legs tied. The images of horses bear close similarity to petroglyphs on nearby peaks of Aravan and Surottuu-Tash (8 km to the north-west from Sulaiman-Too), dated to the Iron Age and later and demonstrating a remarkable collection of some 80 images of beautiful horses possibly bearing a resemblance to the “heavenly horses” of ancient Davan, mentioned by Chinese writers in the 2nd and 1st centuries BC as a source for military horses.

Many of the Sulaiman-Too rock drawings have not been dated; those that have, by stylistic association with other sites, appear to date from around the 15th century BC to the 7th century AD. The majority of images belong to the Bronze Age (circa 1500 BC to circa 500 AD) such as the labyrinths, solar signs, geometrical figures, birds, anthropomorphic and larve-like images. The Davan complex of building survives. Used as a museum in Soviet times, it was returned to religious use in 1990. The Asaf-ibn-Burkhiya Mausoleum of portal dome construction was apparently constructed in the 16th century on the basis of an earlier, possibly 13th century building.

The Islamic monuments are actively used for religious practices and maintained by the local religious community.

**Museum**

The museum was constructed in Soviet times, as a restaurant, inside the Rusha-Unkur, or Eagles cave, the largest two storey cave on the mountain. Its sacred function has been lost by the interventions. In 2000 it was turned into a museum, and is now one of the main attractions for tourists. The ‘Cave Museum’ with its enormous round ‘window’ and concrete front staircase is well visible from the southern borders of the property.
History and development

The location of the city seems to have moved towards the mountain in mediaeval times. Previously it was further south at Ak-Buura, a site that has been shown by excavation to date back to the 3rd century BC.

The earliest written mention of the mountain is in a Chinese source of the 13th century which refers to ‘a town at a highly respected mountain’ and one of the Dawan towns (i.e. presumably a supplier of Dawan horses). The name Barak was recorded in the end of the 13th century and by the 15th century the mountain was know by the Farsi name Bara-Kukh meaning ‘separately standing’ or ‘a beautiful mountain’. The modern name relates to an Arabic legend of a stay on the mountain of the Prophet Sulaiman, or the Biblical Solomon, and was first recorded in the early 18th century.

Written references to the religious significance of the mountain do not appear until 19th and early 20th century. In 1812 Mir Izet Ulla, a Pakistani employee of the East Indian Company wrote in his memoirs that ‘Every spring crowds of pilgrims of different nationalities come here from all neighbouring countries.’ A Russian officer, Nazarov, visited Osh around the same time and mentioned ‘two ancient buildings, and there is a big cave below…[the] buildings are called Takh-Sulaiman’, and that every year the Asians travel to this place to worship it, and they believe spirits worshipped Solomon in this place.’

In the middle of the 19th century Valikhanov, relying on the accounts of others wrote: “…Muhammad knew of the existence of this town and precepted every true believer to visit the Osh sanctuaries at least once in their life. … To worship those places, pilgrims with their families come there every year from Kokand, Margilan, Andijan and other towns of Fergana valley.”

And in 1887 Simonov wrote: “…almost on the top of its eastern peak, there is a muluشكa (a kind of chapel or mausoleum) …[which] serves as an object of worship for lots of pilgrims gathering here from all even remote areas of Turkestan”.

What is clear from all these accounts is the link between the religious significance of the mountain and Islam. Simonov was however the first writer to mention the belief in the curative powers of other shrines on the mountain: ‘natives suffering from various illnesses go there because all the area around the muluشكa is full of memorials (…), which can heal all possible ailments’.

In the early 20th century Masalskiy, and then Castaniye, both mentioned the curative properties of cult places as did several Soviet era authors.

Work on collecting and analysing legends associated with the mountain was begun in the 19th century by Russian scientists and students. Studies on folklore continued in the Soviet period, and in 1987-1989 a special expedition was organised by the Ministry of Culture to collect information on the Mountain and on the micro-toponymy of its peaks, caves, minor cult places and other features, but also on the worshipping and sacrifice rites practiced there.

Although there is no early documentary evidence for the pre-Islamic ritual practices on the mountain, scholars now consider that the earliest period when it was regarded as a sacred place could be the Bronze Age. There is material to suggest that the earliest cult of Sulaiman-Too could be Mithraism. Mithra, one of the most ancient Indo-Arian gods, was later included in the Zoroastrian pantheon. He was regarded as a God of Light, Union and Agreement. According to myths, he was born from a rock in a cave. The Mithraist rites included libation of haoma, the sacred beverage. The cult places of Sulaiman-Too – stones with polished gutters for libations, caves and grottoes (especially those with inclined polished floors, imitating Mithra’s birth from the cave) might be related to those cults.

Efforts to eradicate religious practices at Sulaiman-Too in Soviet times led not only to the demolition of several Islamic buildings, but also to the non-authentic use of the mountain, which was turned into a kind of public park. Non-indigenous karagacch-trees (a type of elm) were planted on the lower slopes with water supplied through iron pipes. In the same period a number of new buildings and structures were introduced including: the modern visitor path (partly overlapping the earlier pilgrim path) the observation platform on the top of the first peak, the TV antenna on the top of the second peak, the frontier post with military barracks and apartment houses near the western foot of the Mountain, the TV-centre, some administrative buildings, including those related to the museum complex, cafes and restaurants, and the memorial stele in front near the eastern foot of the mountain. The most irreversible intervention was the creation of a restaurant in the two-storey natural cave of Rusha-Unkur. This is now a museum and one of the main attractions for tourists.

During the same period, considerable changes occurred to the surrounding townscape with the demolition of the major part of the traditional housing areas and the construction of modern buildings in the historic centre of Osh, added to during preparatory work for the celebration of the 3,000-year jubilee of the city of Osh in 2001.

3. OUTSTANDING UNIVERSAL VALUE, INTEGRITY AND AUTHENTICITY

Integrity and authenticity

Integrity

The integrity of the mountain relates to its intactness in terms of its relationship to the plain and the town at its foot. The three aspects, mountain, town and surrounding landscape need to co-exist in a harmonious relationship.

ICOMOS considers that the interface between these three currently creates some cause for concern and impacts on the visual aspects of the integrity of the property. The mountain is first and foremost a visual symbol of power, separate from the plain, hosting in its curious geology well-used cult sites and offering spectacular views from its peaks.
ICOMOS considers that the visual integrity of the mountain, its cult places, uses and functions are without doubt, even given the numerous interventions over the past 50 years. However since the sacred associations of the mountain are linked to its dramatic form rising from the surrounding plain, it is highly vulnerable to continuing new development on it and around its base. In order to protect its majesty, spirituality, visual coherence and setting and thus the full authenticity of the property, ICOMOS considers that the proposed protection for the buffer zone needs to be put in place as soon as possible.

Comparative analysis

The comparative analysis in the nomination for the property in relation to its region and from the perspective of similar properties inscribed on the World Heritage List is weak in parts.

The functioning duration of the Sacred Mountain of Sulaiman-Too as a sacred site is said to be comparable with the Tien Shan in China, which for two thousand years had been “the Heavenly Empire’s” official symbol, visited by millions of pilgrims. Also mentioned are the Khan Khentei, the Ogoten Tenger, and the Bogd Kahn Mountain, three worshiped mountains in Mongolia, which since the 13th century have been places of annual worship. The longevity of their ancient sacred traditions, rituals and sacrifice practices is said to make them comparable with those of Sulaiman-Too.

The significations of sacred mountains and shrines in China, India, Iran, Mongolia, Korea, Japan, Indonesia and Afghanistan could have been discussed with more specific examples of sites and ideological systems and evidence for their spiritual values.

The material in the dossier would have benefited from more exploration of the conclusions of the UNESCO expert meeting held in Wakayama, Japan, in 2001, on Asia-Pacific Sacred Mountains where there was a comprehensive analysis of Central Asian sacred mountains, and their classification and beliefs and rituals.

It would also have been valuable to have had more material on other active sacred mountains in Central Asia, where pilgrim paths lead up the mountains to caves and smooth rocks revered for their healing qualities, and where herbs are burnt for their special fragrances by visiting pilgrims.

Although other sites in Central Asia (Kyrgyzstan, Tajikistan, Kazakhstan, Uzbekistan) are not mentioned in the dossier, Sulaiman-Too can be said, on one hand, to be typical of Central Asian sacred mountains, for the way its shrines are laid out and used and have been used over many millennia.

However on the other hand Sulaiman-Too is also unusual in Central Asia for its size, shape and concentration of cult material. Sulaiman-Too mountain can be said to present a vivid evidence for existing, strong and continuous traditions of mountain worship, which has spanned several millennia and been absorbed successfully by Islam. Moreover its traditions survived in spite of severe restrictions in the recent Soviet era.

Sulaiman-Too is also one of those very rare mountains, which corresponds closely to iconic images in the Universe of Avesta and Vedic traditions: a single mountain with a peak dominating four others, standing in the virtual centre of a vast river valley, and surrounded by and related to other mountains in the landscape system.

The rich concentration of material evidence for cult practices preserved on the mountain from pre and post-Islamic times, together with its 'ideal' form, present the most complete picture of a sacred mountain anywhere in Central Asia.
ICOMOS considers that Sulaiman-Too is both typical of Central Asian sacred mountains and also an exceptional example of an ‘ideal’ mountain with a rich concentration of cult sites that provides evidence of mountain worship.

ICOMOS considers that the comparative analysis justifies consideration of this property for inscription on the World Heritage List.

**Justification of the Outstanding Universal Value**

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Sulaiman-Too is the only sacred mountain in this part of Central Asia.
- Its location on a crossing of the migratory and trading roads from ancient times until today has led to a symbiosis of various cultures and traditions for more than three millennia, reflected in rock engravings and still active cult places, beliefs and rites.
- The mountain has a dominating position over the surrounding Fergana valley. The clear-cut contours of its five peaks give it a special picturesqueness and attractiveness.
- The mountain’s geology and morphology have been skilfully utilised for three millennia. Visible and accessible vertical surfaces and cult grottoes and crevices have been ornamented with petroglyphs in a triple zoning system matching the ancient idea of the “World Mountain” and the “World Tree”.
- The Sulaiman-Too rock paintings have similar images to other parts of Eurasia, and display types of universal images such as solar signs, hands and footsteps.
- Today, rituals and prayers connected with domestic animal sacrifice, shamanism ideas of fertility, ancestors’ cults or magic treatments are still practiced at the cult sites.
- The mountain’s sacred and cultural qualities appear in early Chinese and mediaeval Arabic and Persian written sources. Western and Russian researchers in the 19th and 20th centuries noted the mountain’s sacredness, which attracted the attention of many pilgrims and visitors.

The mountain has been nominated as a sacred cultural landscape. The sacred landscape apparently goes beyond the physical limits of the Sulaiman-Too Mountain, encompassing the neighbouring ranges of Orto-Too (eastern spur of Aijrmatich-Too) and Kerme-Too (eastern spur of Chil-Mayram), the open plain they encircle, and also the separate Aravan Rock. The sites found there are partly described in paragraph 3c of the nomination dossier. All of them possess cult places and petroglyphs similar to those of Sulaiman-Too. The information available allows them to be regarded as parts of a single whole, a cultural landscape with the Sulaiman-Too Mountain standing at its virtual centre.

ICOMOS considers that Sulaiman-Too is not unique as a mountain with cult sites linked by paths and still actively used; it is however the largest and most prominent mountain in this part of central Asia and its size, scale and location on one of the major arteries of the Silk Roads and the economic importance of the city of Osh, means that it is and for many centuries has been a significant spiritual landmark.

Furthermore Sulaiman-Too corresponds closely to iconic images in the Universe of Avesta and Vedic traditions: a single mountain with a peak dominating four others, standing in the virtual centre of a vast river valley, and surrounded by and related to other mountains in the landscape system.

**Criteria under which inscription is proposed**

The property is nominated on the basis of criteria (iii), (iv) and (vi).

**Criterion (iii):** bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.

This criterion is justified by the State Party on the grounds that Sulaiman-Too bears an exceptional testimony to the cult sites on the mountain and their longevity.

ICOMOS considers that the rich concentration of material evidence for cult practices preserved on the mountain from pre- and post-Islamic times, together with its ‘ideal’ form present the most complete picture of a sacred mountain anywhere in Central Asia.

ICOMOS considers that this criterion has been justified.

**Criterion (iv):** be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.

This criterion is justified by the State Party on the grounds that Sulaiman-Too presents a Bronze Age settlement site.

ICOMOS does not consider that this property, on the basis of present knowledge, can be said to have outstanding value as an individual site or even as part of the wider Chust culture of the Fergana valley.
both the 1st and 2nd peaks, and with intermediate stations. It was said to have been halted at the time the nomination was presented to the Committee in 2007. It was then revived. One was the aerial ropeway or funicular project. This was acknowledged in the Management Plan (see below). The Presidential Decree of 9 June 2008 deemed that the recommendations of the World Heritage Committee for the proposed Mosque should be respected. Construction work was suspended in June 2008. The Mayor’s office subsequently reviewed the permission for the mosque and recommended that the height of the proposed minarets be reduced to from 35 metres to 21 metres. A revised plan in accordance with these changes was submitted to the Ministry of Culture in December 2008. Work may only commence when the revised plans have been agreed by the relevant authorities.

The second major proposed project mentioned in 2008 was the construction of a large new mosque, some 34 metres square and 35 metres high inside the property boundary, to the south of the 1st and 2nd peaks, and which it was stated would impact on the physical mountain and be absorbed successfully by Islam, and has had a profound effect over a wide part of Central Asia. It would appear to be impossible to remove this fully without damaging the cave. Moreover, the eventual removal of this structure would not turn the cave back to its original state, as the ground floor has been considerably reconstructed, further spaces excavated and interior surfaces plastered with cement. Measures to reduce the visual impact would be desirable, although these will require careful consideration to ensure that the authenticity of the property is not further affected.

Three proposed new developments were acknowledged in the additional information provided by the State Party in 2008 as having the potential to severely affect the site.

One was the aerial ropeway or funicular project. This was said to have been halted at the time the nomination was presented to the Committee in 2007. It was then revived. The aerial ropeway would have extended from a base behind the Takht-i-Sulaiman mosque to upper stations on both the 1st and 2nd peaks, and with intermediate stations. It was noted in the supplementary information provided by the State Party that this was ‘in discordance to national legislation’ and would impact on the physical mountain and on its ‘unique functions and meaning’.

Permission appears to have been given for the ropeway by the Mayor of Osh even though the ‘Academy of Sciences, scientific, cultural and arts communities, NGO, Oblast administration and local community’ as well as the community (mahalla) voted against the scheme. In the 2008 evaluation, it was stated by the State Party that the Oblast Governor had plans to approach the President requesting a special decree to stop this project. On 9 June 2008 a special Presidential Decree came into effect that prohibited the construction of the ropeway (and enforced other protection, see below).

The third development project mentioned in 2008 was the construction of a mosque which was 34 metres square and 35 metres high inside the property boundary, to the south of the 1st and 2nd peaks, and which it was stated could become a ‘serious visual disturbance to the Mountain’. The initiator of the project was the Oblast Government and the project was said to have been given permission by an order of the Prime Minister. The need to revise this project and reduce the height and impact of the building was acknowledged in the Management Plan (see below). The Presidential Decree of 9 June 2008 deemed that the recommendations of the World Heritage Committee for the proposed Mosque should be respected. Construction work was suspended in June 2008. The Mayor’s office subsequently reviewed the permission for the mosque and recommended that the height of the proposed minarets be reduced to from 35 metres to 21 metres. A revised plan in accordance with these changes was submitted to the Ministry of Culture in December 2008. Work may only commence when the revised plans have been agreed by the relevant authorities.

The third development project mentioned in 2008 was more generic and concerned the increase in the size of villages on the plain in the Buffer Zone and the replacement of one-storey houses with high-rise apartments. One solution proposed in the supplementary information was to relocate the apartments to the eastern boundaries of the Buffer Zone or further to the outside of the zone.

The third development project mentioned in 2008 was more generic and concerned the increase in the size of villages on the plain in the Buffer Zone and the replacement of one-storey houses with high-rise apartments. One solution proposed in the supplementary information was to relocate the apartments to the eastern boundaries of the Buffer Zone or further to the outside of the zone.

The Administration of Osh Region and the Department of Architecture and Construction of Kara-Suu confirmed in a letter of 24 December 2008 to the Ministry of Culture that previous decisions on constructions of high-rise buildings in the buffer zone have been cancelled. In the future the zone in the buffer zone delineated for individual house construction (see below) will have a height limit of two-stories. More generally there were said to be plans for the expansion of urban areas to the north and west of the city. To control this expansion it was suggested that zoning is needed for the Buffer Zone but this had yet to be put in place, and the Buffer Zone did not have formal approval at the time of the 2008 Committee. This has now been put in place – see below.

The Presidential Decree and other decrees of the Mayor of Osh have therefore given effect to the Emergency protection measures listed in the Management Plan (see below) as ways of countering the threats listed above.

Lack of conservation

The preparation of the 3000th anniversary of Osh led apparently to an increase in funding for new buildings and a diminution in conservation funding, as well as some inappropriate conservation work (see below).
Tourism pressures

Uncontrolled visitor access for many years resulted in a damage to petroglyphs found in the lower parts of the first and second peaks: a number of modern graffiti, mainly painted, but also those engraved and/or pecked, cover many rock surfaces. Most of those graffiti were made before the creation of NIAMK (the Sulaiman-Too National Historical and Archaeological Museum Complex), mainly in Soviet times. However, also during the last six years, after the establishment of a permanent on-site guardianship, quite a few new painted graffiti have appeared on some easily accessible surfaces. As mentioned below, there is currently no local expertise to deal with the conservation of damaged sites.

Many visitors come to the mountain both from within Kyrgyzstan and from other countries. The local municipality is interested in encouraging tourism as a way of gaining income. The current paths and visitor facilities and guarding arrangements are inadequate for a major increase in numbers.

These issues are acknowledged in the Management Plan, which foresees the development and extension of the existing public parks/recreational areas along the Ak-Bura river, both within the city boundaries and beyond, upstream. This would include ecological revival/recovery, landscaping, planting trees and providing improved visitor facilities in those areas for both pilgrims and local teenagers, who are identified as the main affecting factor to the Mountain.

In order to welcome and host foreign pilgrims whose numbers grow gradually year by year, alternative possibilities for low-cost accommodation, services and facilities for pilgrims in the adjacent parts of the city (not disturbing the nominated area) are foreseen in the new Master Plan.

Environmental pressures

There is a need for measures which limit environmental degradation from uncontrolled access and this is acknowledged. There is also a need to limit strictly the planting of trees on the mountain which could affect the ecological balance.

Natural disasters

There are no perceived natural disasters.

Impact of climate change

Increased dryness could have the effect of increasing erosion from visitors walking the paths and severe, heavy rainfall could be equally problematic.

ICOMOS considers that the main risks to the property are uncontrolled development, the expansion of the city to the west and insufficiently controlled visitor access.

Measures under way to incorporate protected areas into the Town Plan are a major step forward. ICOMOS also considers that there is an urgent need to define activities and proposals for a tourism strategy that addresses visitor access issues and protection of the sacred sites and petroglyphs from visitor impacts as envisaged in the Master Plan.

5. Protection, Conservation and Management

Boundaries of the nominated property and buffer zone

The nominated property includes not only the open mountain, with shrines, rock art and access paths, but also at lower levels, built up areas in the town, plantations, military barracks, TV station and tourist facilities.

ICOMOS understands that some intrusive buildings have already been demolished during the last 5 years, and there are plans to remove other modern structures, replacing them with movable traditional structures (yurts) for seasonal visitor services. For the present however the Kyrgyz authorities consider the problem of transferring the military unit elsewhere and the removal of its buildings from the foot of Sulaiman-Too insolvable, because of its importance as a post in the vicinity of the Uzbek frontier.

On its north-east, east and southern sides, the nominated property is surrounded by a buffer zone encompassing some of the city. To the north and west the buffer zone includes within its boundaries the Kerme-Too and Orto-Too mountain ranges, with their archaeological sites and petroglyphs, situated west and north-west of the city, along with the rural landscape of the valley that they and Sulaiman-Too encircle. This buffer zone has been much enlarged since the nomination was first submitted and now has adequate boundaries.

ICOMOS considers that the boundaries of the nominated area of Sulaiman-Too, and that the enlarged buffer zone adequately encompass the extent of the mountain’s unspoiled setting to the north and west, and the related peaks of Kerme-Too and Orto-Too.

Ownership

The nominated property is a national property of the Kyrgyz Republic.
Protection

Legal Protection

The nominated property is inscribed within a larger Protection Zone formally established by the Decision of the Kyrgyz Government No 638 of the 8 September 2006. Sulaiman-Too is one of two exceptional cultural reserves in Kyrgyzstan having not only the status of National Cultural Heritage Reserve, but also clearly defined and legally approved boundaries. This Zone comes under the responsibility of the Sulaiman-Too National Historical and Archaeological Museum Complex, and any new constructions within its extended boundaries are prohibited, unless a special agreement is obtained from the relevant national authorities responsible for the protection of cultural heritage and natural environment.

The nominated property is also inscribed on the National List of Properties and given a formal status of National Historical and Archaeological Museum Complex. It is also covered by the provisions of:

i. Use of the Historical and Cultural Heritage, No 91 (with Amendments of 2005)


iii. 1999 Law On the Protection of Nature

According to (i) and (ii), in order to provide proper protection and use of the cultural properties, zones of legal protection (Protection Zone, Zone of Planning Control and Zone of Protected Natural Setting) need to be established and incorporated in regional and urban development plans and projects.

The Protection Zone for Sulaiman-Too had already been established at the time of nomination but the boundaries and regulations for the Zone of Planning Control and for the Zone of Protected Natural Setting to provide extra physical and visual protection around the property were still at the stage of preparation work in 2008 and had not yet been incorporated in the regional development plans of Osh oblast, nor in the urban development master plan of the city of Osh. This urban master plan was approved in the Soviet times, but it still serves as formal guidelines for developers. According to this plan, the traditional housing in the area surrounding the Sulaiman-Too Mountain is to be demolished and replaced with new public and apartment buildings up to 5 storeys in height. This master plan is no longer valid, and a need for its revision has been recognised.

In 2008, the Committee requested that formal protection of the nominated site should be put in place through incorporating it and the enlarged Buffer Zone into the city Master plan to give both of them effect as part of the overall zoning plan for the city, through finalising the Protection Zoning Project document as part of the Urban Master Plan.

The supplementary information provided by the State Party in January 2009 reported that development of the new Master Plan had started in January 2008 with national funding. It also reported that work on developing protection zones for the historic centre of Osh, and the adjacent Kara-Suu region of Osh oblast, within the Master Plan, had been started in May 2008 by Kyrgyzrestoration (Scientific Research and Design Bureau under the Ministry of Culture).

On 19th December 2008, local and national authorities agreed that Protection Zones for the nominated property and the Buffer Zone should be included in the new Master Plan and that these will respect the proposed boundaries. It was further agreed that restrictions and regulations for every sub-zone within the nominated area will be put in place. These sub-zones include:

- Sulaiman-Too legal protection zone
- Zone of planning control, within the City of Osh
- Zone of archaeological protection for Kerme-Too and Orto-Too
- Existing village zones
- Planning control zones in the rural area
- Zones of protected agricultural landscape
- Protected areas for further archaeological surveys.

To protect the property and its buffer zone against modern developments during the period before the completion and final approval of the Legal Protection Zoning Document and the Osh Urban Master Plan, a map showing the agreed boundaries of the nominated area, of the buffer zone and its sub-zones have been distributed as a reference to the responsible agencies of the Osh oblast, Osh city, Karasu district and Kyzylkyshtak rural area.

As well as the proposals above, it is also agreed at the December meeting that activities on protection and revival of traditional dwelling quarters and their infrastructures (mahalla) are to be foreseen, that continuation of works on the removal of existing unsightly modern structures from the nominated area will be planned, as suggested in the Management Plan and that removal of existing unsightly modern structures from the Buffer Zone will be continued.

It is stated that the revised draft and progress achieved will be reported to the State Agency on Construction and Architecture, the Ministry of Culture, the Public Council for consideration by March 2009.

It is understood that the Master Plan will be finalised at the end of 2009 and come into force in 2010. In the meantime the zoning arrangements will be respected under the terms of the Presidential decree. (see above)

Traditional Protection

The sacredness of the shrines is a key attribute of the mountain and one that should be seen as part of traditional protection.

Effectiveness of protection measures

The current and anticipated protection measures are adequate.
ICOMOS considers that although the nominated area has legal protection, this needs to be incorporated into the city plan to give it effect as does the buffer zone as part of the overall zoning plan for the city. Considerable progress has been made on establishing protection zones, which will come into effect under the Protection Zoning Project document as part of the Urban Master Plan. In the meantime they are given effect under the Presidential decree.

Conservation

Inventories, recording, research

During Soviet times although the mountain was de-spiritualised, it was protected. After independence and before alternative systems were put in place some damage was done in the form of new petroglyphs and burials.

Between 1997-2000 a protection programme was begun. Defensive enclosures were put up on the northern-eastern, eastern and partially on the southern mountain sides, conservation of the petroglyphs started, and partial restoration works on the Rafat-Abdullakhana mosque and the Asaf-ibn-Burkhiya Mausoleum were conducted. Work was also undertaken on the main visitors’ routes. Since national protective status was gained in 2004, visitor protection and conservation have been funded as on-going activities.

Present state of conservation

In spite of the many negative interventions on the mountain, a large part of it remains unspoiled and still retains its spiritual qualities respected by visitors.

Active Conservation measures

The property is now actively protected and the Management Plan sets out a strategic approach for on-going preventive conservation measures as well as for remedial measures to tackle damage to the petroglyphs at certain sites, and on-going maintenance of the paths. Implementing this approach will need improved decision-making (see below).

Maintenance

On-going maintenance needs to be improved and this is envisaged in the management plan.

Effectiveness of conservation measures

The effectiveness of the overall conservation of the mountain and its shrines, paths and other structures will rely on the combined efforts of authorities, local residents and visitors.

ICOMOS considers that conservation of the property is stable but needs to be supported by delivery of the conservation approaches set out in the Management Plan.

Management

Management structures and processes, including traditional management processes

The management of the nominated property is the responsibility of the Sulaiman-Too National Historical and Archaeological Museum Complex (NIAMK), which comes under the aegis of the Ministry of Culture, and is financed from the national budget. The Management Plan sets out the intention to further upgrade the status of NIAMK, through subordinating it directly to the Government which would apparently improve its funding. The office of NIAMK is situated on the property.

Policy framework: management plans and arrangements, including visitor management and presentation

A Management Plan was submitted as supplementary material in January 2008. This was approved by the Ministry of Culture on 24th January 2008. The Plan was prepared by a multidisciplinary Project Team headed by the archaeologist from the National Academy of Sciences and composed of NIAMK staff members, specialists from universities and representatives of national and local organisations. Advice was provided by two external experts from Kazakhstan and Japan. The Plan was financed by the World Heritage Fund.

The Plan is an aspirational document that sets out strategic direction for the nominated property and its buffer zone. These respond to key management issues. What is not set out however is the outstanding universal value of the property and thus what is being protected. A Section on this needs to be added. The need to protect not only the mountain’s physical heritage but also its intangible heritage is however stressed.

The Plan sets out a detailed list of Emergency Protection measures such as cancelling the aerial ropeway project, revising the proposed mosque, finalising legal protection, approving the buffer zone and prohibiting further new construction within he nominated area.

The need for capacity building within NIAMK and improved decision making is highlighted. The creation of a Site Management Public Council foreseen in the Plan was established on 20th June 2008. This involves 20 representatives of all responsible agencies and stakeholders concerned as the main coordination body on the management of the site and its Buffer Zone. It is co-chaired by the Vice-Governor and the supervising Deputy Minister of Culture. Statutes for the Council’s activities in four main fields are being developed, and corresponding groups formed, one of which will be responsible for monitoring the execution of recommendations of the World Heritage Committee and the activities included in Management Plan. The new Council is said to demonstrate the increasingly active participation of scientists, the National Committee of ICOMOS and the local community in the property.

In order to raise awareness of the value of the nominated area, including its visual aspects and relationship to its setting, and to encourage visitors to respect its fragility, an outline of a project is set out which would re-organise the cave museum and turn it into an exhibition on the history
of the mountain and its sacral organisation. Delivering such a plan is not currently the responsibility of any of the partner organisations, whose roles are identified in the plan.

An Action Plan for 2008-2010 has been developed by a Working Group jointly with the Ministry of Culture, the Academy of Sciences, and the State Administration of Osh region. This was approved by the Ministry of Culture on 26th June 2008. It consists of immediate actions to be taken according to the Management Plan and its two sub-plans. The Action Plan consists of the following parts:

I. Legal and Organizational measures (development and approval of a state program, development and approval of a new Master Plan for Osh city, to incorporate protective zones and buffer zones of the property, tourism management programs, etc)
II. Improvement of the structure of the museum, and capacity building
III. Improvement of conservation and protection
IV. Improvement of on-site facilities
V. Publications and promotional activities

Risk preparedness
This is an area were little planning has yet been put in place.

Involvement of the local communities
There is some engagement of the local community and the possibility for more engagement, particularly of local young people.

Resources, including staffing levels, expertise and training
NIAMK is headed by a Director-General recently appointed by the Governmental Commission for Cultural Heritage with the agreement of the Governor of Osh Oblast. The permanent staff of NIAMK includes two Assistant Directors, clerical staff, several specialists of different professions (including historians and biologists), and also site personnel. Currently there is no expertise available on the conservation of petroglyph sites.

The municipal police have been involved in patrolling the property since July 2006, as a necessary measure against visitors (mainly local teenagers) leaving graffiti on the rocks with petroglyphs.

The annual budget allocations for NIAMK are limited. It is anticipated that the proposed upgrading of the NIAMK’s status will bring benefit in respect of funding, staffing and increased possibilities for capacity building.

ICOMOS considers that the strategic approach set out in the Management Plan is to be commended and the creation of a Site Management Council and a short-term Action Plan.

6. MONITORING
All archaeological reports from the 1940s to the present are kept in the Institute of History of the National Academy of Sciences. A solid package of documentation of the petroglyphs has been produced during last three years, within the framework of a UNESCO Project on the creation of the Central Asian Rock Art Database. The documentation of petroglyphs and ancient cult places continues at the adjacent sites of Surottu-Tash (Orto-Too) and Kerme-Too, with the aim of providing the necessary documentation and justification for the establishment of enlarged zones of legal protection.

Detailed mapping of the paths on the property and their relationship to the cult sites has begun. There are no other approved plans for further research work, due to a lack of funding.

A few monitoring indicators have been put in place, including temperature, vegetation, visitor numbers and sedimentation. The most valuable is an annual photographic record of the main archaeological and architectural monuments.

ICOMOS considers that the monitoring is adequate.

7. CONCLUSIONS
Sulaiman-Too is a spectacular site and one that deserves protection and full understanding.

ICOMOS considers that the property has Outstanding Universal Value as a spiritual landscape with formal paths, apparent zoning system, and collection of cult sites reflecting both Islamic and pre-Islamic beliefs (particularly the cult of the horse), many of which are still in use, as well as for its associations with cult practices that had a profound effect over a wide area of Central Asia.

ICOMOS commends the State Party for its strategic approach set out in locally developed Management Plan and for enlarging the Buffer Zone to incorporate the wider setting in the plain and its neighbouring peaks, both as requested by the Committee when the nomination was referred at its 31st Session.

In response to the requests made by the World Heritage Committee at the 32nd session, ICOMOS commends the State Party for putting in place a presidential decree that effectively stops the aerial ropeway, aims to reduce the impact of the proposed mosque, reverses decisions on high-rise buildings in the buffer zone and agrees that the boundaries of the property and its buffer zone shall be incorporated into the Master Plan, currently being re-drafted protective zoning of both should be implemented in line with the Committee recommendations.

ICOMOS further notes that the proposed zoning addresses the needs of the property and its buffer zone.

ICOMOS also notes that a Site Management Council has been set up to take forward the Management Plan and a two year Action Plan developed.

ICOMOS considers that considerable progress has been made to ensure the protection of the wider landscape which is so necessary to ensure the spectacular visual and spiritual aspects of the property, through the Presidential Decree which ensures that governmental decisions must be
in conformity with the recommendations of the Committee and progress with the Master Plan and defining protection for specific zones.

**Recommendations with respect to inscription**

ICOMOS recommends that Sulaiman-Too Sacred Mountain, Kyrgyzstan, be inscribed on the World Heritage List on the basis of criteria (iii) and (vi).

**Proposed Statement of Outstanding Universal Value**

Sulaiman-Too Mountain dominates the surrounding landscape of the Fergana Valley and forms the backdrop to the city of Osh. In mediaeval times Osh was one of the largest cities of the fertile Fergana valley at the crossroads of important routes on the Central Asian Silk Roads system, and Sulaiman-Too was a beacon for travellers.

For at least a millennium and a half Sulaiman-Too has been revered as a sacred mountain. Its five peaks and slopes contain a large assembly of ancient cult places and caves with petroglyphs, all interconnected with a network of ancient paths, as well as later mosques.

The mountain is an exceptional spiritual landscape reflecting both Islamic and pre-Islamic beliefs and particularly the cult of the horse.

Sulaiman-Too corresponds closely to iconic images in the Universe of Avesta and Vedic traditions: a single mountain with a peak dominating four others, standing in the virtual centre of a vast river valley, and surrounded by and related to other mountains in the landscape system.

**Criterion (iii):** The rich concentration of material evidence for cult practices preserved on Sulaiman-Too mountain from pre- and post-Islamic times, together with its ‘ideal’ form present the most complete picture of a sacred mountain anywhere in Central Asia.

**Criterion (vi):** Sulaiman-Too presents exceptionally vivid evidence for strong traditions of mountain worship which have spanned several millennia and been absorbed successfully by Islam. It has had a profound effect over a wide part of Central Asia.

The authenticity of the mountain, its cult places, uses and functions are without doubt, even given the numerous interventions over the past 50 years. However, since the sacred associations of the mountain are linked to its dramatic form rising from the surrounding plain, it is highly vulnerable to continuing new development on it and around its base. In order to protect its majesty, spirituality, visual coherence and setting and thus the full authenticity of the property, great vigilance will be needed in enforcing protection of its setting.

The integrity of the mountain relies on protection of the cult places and their connecting paths as well as their visual linkages and views to and from the mountain.

The management of the mountain and its setting is coordinated by a Site Management Council who oversees the implementation of the Management Plan and Action Plan. Its effective protection relies on approval of an agreed zoning arrangement within the Osh Master Plan. To protect the property and its buffer zone against modern developments during the period before the completion and final approval of the Legal Protection Zoning Document and the Osh Urban Master Plan, a map showing the agreed boundaries of the nominated area, of the buffer zone and its sub-zones have been distributed as a reference to the responsible agencies of the Osh oblast, Osh city, Karasu district and Kyzylkyshtak rural area.

ICOMOS recommends that the State Party should give consideration to the following:

- Define urgently a tourism strategy that addresses visitor access issues and protection of the sacred sites and petroglyphs from visitor impacts;
- Ensure that the proposed upgrading of the Sulaiman-Too National Historical and Archaeological Museum Complex’s status will bring benefit in respect of funding, staffing (expertise on the conservation of petroglyph sites) and increased possibilities for capacity building.
Map showing the boundaries of the nominated property
General view of the Sulaiman-Too Mountain

Stone and Bronze Age site on the 3rd peak
Petroglyph representing a labyrinth

Ancient sanctuary
Gate at the starting point of the main pilgrim path