

National Park Service (NPS) History Collection

NPS Oral History Collection (HFCA 1817)
National Heritage Areas Administrative History Project



Martha Raymond
March 21, 2017

Interview conducted by Antionette Condo
Transcribed by Antoinette Condo
Reviewed by Martha Raymond
508 compliant version by Jessica Lamb

This digital transcript contains updated pagination, formatting, and editing for accessibility and compliance with Section 508 of the Rehabilitation Act. Interview content has not been altered.

The original digital transcript is preserved in the NPS History Collection.

The release form for this interview is on file at the NPS History Collection.

NPS History Collection
Harpers Ferry Center
PO Box 50
Harpers Ferry, WV 25425
HFC_Archivist@nps.gov

My Narrative
The Administrative History of the National Heritage Areas Coordinating Office

Martha Raymond
March 21, 2017

Interview conducted and transcribed by
Antoinette J. Condo

This transcript was reviewed by Martha Raymond

Martha Raymond Interview: March 21, 2017

I first became aware of heritage areas when I worked at the Ohio Historical Society in the Historic Preservation Office. I participated in some of the committee meetings related to the Ohio's Hill Country Heritage Area which was designated a state heritage area. I was fascinated by the partnerships that were discussed and described. Dan Rice, of Ohio and Erie Canalway National Heritage Area, was one of the primary speakers at our first meeting and his enthusiasm and the information he conveyed about the national program was just captivating. That went on for a couple of years. The Ohio's Hill Country State Heritage Area was designated, and I stayed involved at least as far as staying in touch with the heritage area and their work.

Later I learned about the National Heritage Areas Program and when I saw that a position was available here in Washington I was immediately interested. I applied and was offered the job.

Evaluations issues: The primary issue was crafting a methodology that would be pertinent to all the heritage areas and their different varieties of governance and the different pieces of legislation that govern them. We wanted one consistent methodology that would apply to large and small, well-funded and less well-funded, urban, rural, all the varieties of the different governance – non-profits, state, and local governments, commissions, and universities. That was the biggest challenge. I am very comfortable now with the evaluations. They have been time tested. We've done enough now and had enough feedback from heritage areas in the past few years that they are very comfortable with them. We are pleased with the evaluators, pleased with the methodology and have heard from several that it really helps them take a step back and look towards the future of their organization.

I do really like the methodology. I am concerned that they are so expensive. They are about \$100,000 each, so that's high. One of the reasons for the expense is that we look back at the entire history of the heritage area including their financial analysis of all the years they have received federal funds. That is very time consuming because that goes back ten or more years. Some have had better record keeping than others, that push-pull of getting information together for the evaluation. We do this because this is what Congress has asked for when they outlined what should be in an evaluation. That you look back at the assistance and what the impact has been. We don't really want to lose the whole picture of the heritage area. That's my biggest concern, just the cost. I've kind of weighed, do we just look at five years of their financial records and maybe cut costs that way? So far, I have rejected that because I really like the idea that the evaluations are consistent so far from one area to another, at least after the pilot. The pilot was a little different but after the pilot they have been consistent.

If there is a reauthorization that involved new legislation that could potentially call for a new evaluation, then we would certainly follow through on that. As it is, what we have been encouraging the heritage areas to do is to develop an internal evaluation process. We call it the *culture of evaluation*. Makes good business sense for an organization to do comprehensive self-evaluations on a periodic basis. It is not something that we require them to do but certainly something we encourage them to do. Not something they would send to us. It could be just for their own information. We would be happy to take a look at them, but as it is now, we are just trying to get through the first round of evaluations of all the heritage areas. It is possible that the

first one may be the only one they have from the federal government. There is provision in program legislation for evaluations but that's not been passed so it really would be determined by the existing legislation.

Heritage area governance: There are very few federal commissions left (as managers of heritage areas). It was an early model. It makes sense in some cases, like for the Gullah-Geechee Cultural Heritage Corridor, a four-state area. There was not a history of the organizations within that long linear area working together over time and it made sense to have a federal commission bring everybody together. There are cases where it does make sense, and it was the norm for heritage areas. A new norm, for long-term financial sustainability, has been non-profit organizations, because they can bring in outside funding. One of the aspects of financial sustainability planning is how do you raise funds, bring in additional match funds for your federal dollars and have leverage. That is not something that a federal commission can do.

It tends to be a more grass roots effort when it is a local effort rather than the federal commission, which is a top-down approach. That is an important distinction. The heritage area model works so well as a grass roots local initiative and those local initiatives are more prominent now.

Cooperative agreements: My primary concern with the cooperative agreements is the lack of consistency from region to region. That's just a situation within the NPS where the regions have their own power. Their own financial assistance folks. Their own way to do things that suits their region. But when it comes to trying to have a level of consistency over a program, we have not yet been successful in providing that consistency and that is a big problem. Heritage areas from one region will say, well a heritage area in another region gets to do something differently. Different interpretations just cause conflict. We don't want conflict, especially over money. That is a long-term goal of ours. We are bolstered by the fact that there is a Washington level financial assistance person, Heidi Sage, who now is charged with trying to bring more consistency region to region. That can potentially help out with this problem. The cooperative agreements will get to a place where there is more consistency. They are just not there yet.

Program legislation: I think program legislation will help the national heritage areas become a true program within the NPS. Right now, we are just an agglomeration of 49 pieces of legislation. If we had our organic act, we would be a program officially and we would get the recognition and consideration that comes from that. I've heard in the past that perhaps the Office of Management and Budget does not support the program in part because it's not officially a program with program legislation. I haven't heard it from anyone directly at OMB. It would just legitimize the program. That would be good for the program. But, I think, it's equally important for it to be good program legislation. That is something that needs to be crafted.

Components of good legislation would include: A consistent way to bring heritage areas into the fold as far as feasibility studies are concerned. We have our feasibility studies guidelines now, but they are still marked *draft*. They will be marked draft until we have an actual program and then we can finalize them. We are trying to bring consistency to that process, and it would be great to have that codified. Same for doing the management planning. Same for all these parts, the evaluations, and the funding. Over a period of years there is a sunset of funding for the

heritage areas outlined in current individual legislation, but in the program proposal currently on the Hill it would sunset the entire program after 20 years. That is one of my concerns with the current proposal. In program legislation I think that you lose too much if you create a system, bring all the existing heritage areas into that system and then have the system sunset twenty years after the legislation is passed. Under that idea you would lose the designation of the heritage areas in perpetuity which is what our existing separate pieces of legislation bring them. It is important to protect that because twenty years goes by really fast.

The NPS bill, that did not go forward, would have codified the opportunity to have additional, on-going support for heritage areas. The heritage area would be designated in perpetuity under their own individual pieces of legislation. The NPS changed its earlier opinion to supporting ongoing administrative support for work with heritage areas after their funding authorization had sunset. We had set it at \$250,000 per fiscal year (in an earlier NPS draft of program legislation) and what we would go for now would be at least \$400,000. That (change) came out of our research for the funding formula, what the basic operations expenses would be for a sustainable heritage area. I personally, as a program manager, would work toward that at this time. Figures get out of date with inflation pretty quickly but at least we would want to have that higher number if we had an opportunity to make that proposal. A staff of five is an average sustainable number of employees for a heritage area. You need someone as the lead person, the financial person, communications, programs. The sustainable surveys that were done indicated that if you were just one or two people it would be tenuous whether you were going to be sustainable.

OMB seems in opposition to financial support in perpetuity for the heritage areas. The designating bills have a sunset date and OMB thinks then they should sunset. Whereas many of the heritage areas think, well that's a sunset date that can then be extended. That is what has turned out to be true. The NPS thinks these are great projects of innovation that we have studied. We have looked at them through the evaluations. We have looked at them through the economic impact studies. We have anecdotal evidence from the park superintendents. We have surveyed them related to their sustainability. We know that they are accomplishing what they are supposed to accomplish, and in ways that the NPS cannot accomplish. Why wouldn't we support them? They are accomplishing the mission of the NPS in this other way. We want to support them.

NPS Responsibilities to heritage areas: We did a brainstorming session in 2008 and lined up what everybody's responsibilities are. Basically, the regional coordinators have the front-line responsibilities of working with the heritage areas once they are designated. Get them set up and make sure that they have their cooperative agreement. That's the primary function of the regional coordinator, looking after the money. Making sure it's processed properly and accounted for properly. Technical assistance is another important role of the regions. It's great to have that support system across the country.

As far as the national program goes, we do work on legislation, the program's budget, also technical assistance, and work on specific projects to bring it together as a program and have some good consistent approaches. For example, when I started, I was asked to make this more of a consistent program. Even though we didn't have program legislation, try to craft it. There were some issues where there really were distinctions. We had two separate solicitor's opinions

from regions on how to handle NEPA for management plans. That was a clear-cut inconsistency, so we worked hard to come up with a consistent process for NEPA. Worked with the solicitors nationally and came up with a process that we have shared with the regions and heritage areas. Designations of heritage areas beginning in 2009 include a consistent approach on how to deal with NEPA in their management planning process.

We have been working nationally on the funding formula. We worked with all of the heritage areas and their park liaisons, and kept the NPS director, the deputy director and the other heads of the organization informed about the process. The national-level coordination is a distinction between the regions and the national office.

The regions get what's called our technical assistance administrative line item. The program as a whole is under heritage partnership program funding with two-line items. One is the commissions and grants, that's the larger bulk of the money that goes out to the heritage areas. Then, the technical assistance and administrative line item for the NPS. Each region gets their portion based on having a regional coordinator and an additional amount for each heritage area that they have. The Northeast Region gets the most of this type of money because they have the most heritage areas. The Northeast Region coordinator Peter Samuel's salary is funded by ONPS money (Operations). So, all the technical assistance money that goes to them goes to technical assistance or to an assistant he has hired to help him do some additional work having to do with publicity. He can use that money for staffing or technical assistance. He has more flexibility because his staff time is covered by this other ONPS line item. The other regions are using this technical assistance and administrative line item for their salaries, so they have little left over for technical assistance projects. That has varied over the years. Two other regional people had ONPS money that went towards their salaries or Historic Preservation Fund money that went toward their salaries. When they retired, that money went away, and the technical assistance and administrative assistance money was used to fill in behind them.

Engaging NPS leadership: When I started working with heritage areas, I saw that engaging the NPS leadership was something that needed to be improved (suggestion by Second Century Commission Report that there should be more engagement of NPS institutional culture with heritage areas). There seemed to be a lack of knowledge in the leadership on the ground about how heritage areas work and benefit the mission of the NPS. We very strategically tried to engage the NPS leadership through a series of briefings and made sure we shared written information, shared descriptions. We encouraged the heritage areas executive directors when they came to town to have meetings with NPS leadership so that they could hear from the executive directors themselves about the work they were doing. I found that to be really beneficial. Katie (Durcan) and I worked particularly with the communications office on a Flat Hat Chat by Jon Jarvis. We were able to use quotes from the Flat Hat Chat and build them in to future communication. We also worked with Jon Jarvis and Chick Fagan on our policy memo, which was so important to us, because it became official policy of the NPS, sent out to all employees to support the work of national heritage areas and showed the director's strong support for the program.

I have to emphasize that the meetings with the executive directors was so important because what I would see was, they would tell a story, for example, to Peggy O'Dell about some work

they were doing and then I would hear her use that story in other communications that she made. By that you just knew that you were reaching someone with this great information that the heritage areas had to share but you just needed a conduit for sharing it.

Quality of life as used in heritage area definition: It is so important. It can be kind of ephemeral, but it is evident when you visit a heritage area because it has to do with the livability of an area, both for the residents and for people who visit the heritage area. For example, it adds to the livability of an area if you have ready access to a trail. Or, if you have access to a river or stream where you can have outdoor recreation and have clean water to do that in. The improvement of economic development is another piece. That is an aspect of what heritage areas do. Particularly, in regard to tourism, they would bring the opportunity for outside visitors to come in and enjoy the heritage, enjoy the culture within the area in some kind of unique way. I am just blown away when I go to heritage areas and view the kind of engagement they have with the culture and with the heritage, with the architecture, with the resources. Getting outdoors, riding a bike. Getting in a tube, going down the river.

I find it so evident when I visit heritage areas and that inspires me to share that further. Education is another piece that's really inspirational, and that adds to *quality of life*. When kids visiting the area can really engage with the area. Get outside and enjoy the resources within the heritage area, natural resources, historic buildings, the culture that's presented as part of their education. That stays with them. That is another aspect of *quality of life*. All of those things kind of come together and add so much to a community and helps people become stewards of the community, hopefully, going forward so that it's another aspect of having local people care for their heritage and their culture.

Quality of life can mean different things to different people, but I think it is a good descriptor (as part of the definition of a heritage area).

Why program legislation has not passed: I really don't know. I have heard that some people in Congress think it would be limiting. They like to have their own heritage areas designated in their own way. In general, it's been hard in the past few years for the NPS to have any legislation passed. Years ago, NPS had program legislation they were pushing for a while, and it did not get out of committee. The decision was then made through the director and the Legislative Affairs Office to work with Congress on their bill. That seemed the best chance of having program legislation pass. It still hasn't passed. There is another bill that has been introduced so there still continues to be opportunity for that to happen.

Management plan: It has been in the legislative proposals in the last three times that the management plan would come before designation. The NPS has consistently suggested that the management plan be done after designation. The way the program works now, you would have a feasibility study, then designation. After designation they would have three years to do early implementation projects, get to know their partners, bring partners together on projects, and that would give them the opportunity to build their partnership network. Then be able to develop their management plan with their partners; one reason why it is good to have it after designation.

The other is very practical. If you have done a feasibility study and you are creating that with public meetings, the last thing you want to do is to say, we're going to have a whole new cycle of meetings and complete another planning document before we get designated. The feasibility study is supposed to show potential for a successful heritage area. We have beefed up the feasibility study process so there is a lot more emphasis on sustainability. It is a very solid document now if a heritage area does a feasibility study that follows the recommended criteria. It should answer the question of whether or not it has potential for success as a heritage area.

The management planning is going well the way it is now, from experience. It is my understanding that it is the Pennsylvania model to have the management plan for the state heritage areas come before designation and my understanding that that is one of the reasons it shows up time and again in the legislation proposals coming from the Congress.

Components of a successful heritage area: If we look at the new heritage areas as they would come online, what we have observed is the ones that have operated as a heritage area long before they get their designation are the ones that are most primed for success. Journey Through Hallowed Ground, for example, operated as though they were a heritage area for at least seven years before they got their designation, and they hit the ground running. They had done some other planning. They did a by-way plan, so had some of that planning under their belt by the time they became a National Heritage Area.

I think that is very important. It has been a struggle for the Gullah-Geechee National Heritage Corridor to pull themselves together as a federal commission because they were created out of whole cloth. They were created as the top-down commission and not having experience to work together. All these years into their time they are just really getting started as a heritage area. They spent a lot of time planning. But they had to because they had not worked together as an organization.

There are also some exciting things that I see that lead to a successful heritage area, such as good communication skills. Freedom's Frontier has excellent communications skills that just jump off the page. One example is the Monday Minute. They have all these short, concise, interesting messages by good writers. I think when you are trying to bring people together in a two-state area that kind of communication skills is so important. I have seen that in other heritage areas too. I just think Freedom's Frontier really excels.

Good business practices are absolutely paramount. You have to take care of and be accountable for the money. That is extremely important. But also, some other business practices are important, like strategic planning. Many of the non-profits have boards, so their engagement with their board is important. How do they, over a period of time, take a look back at their management plan and try to move that forward in strategic chunks. They want to know, now that time has passed, how are we going to continue to implement this management plan in the most successful way. Continuing engagement of the public is very important. Self-evaluation is key. That can be part of that strategic planning process.

I'll mention Journey Through Hallowed Ground again. When Cate Wyatt was there, she called herself the matrix queen. Her team was constantly evaluating the success of their programs and

if they had success with a program, they would continue but if they weren't successful, they would not. They wouldn't keep putting money toward something that was not successful. They have described this process at meetings and other heritage areas have learned from that. That is really key.

The last point is financial sustainability. That is important for a successful heritage area because the federal money will not last forever or is going to be reduced over time. For them to be successful they need to have built their skills for bringing outside funding. Great Basin National Heritage Area is challenged in this because they are very large and very remote. They have thought about expanding their boundaries to include a larger population. The key people who volunteer with the heritage area there are doing the same kind of work for other organizations, too. Everybody is kind of stretched.

Heritage areas not part of the National Park System: We make that distinction because it is helpful to say that heritage areas are not park units because park units have their own list of regulations and regulatory requirements that they have to stick with and those do not apply to national heritage areas. Heritage areas can be a lot more flexible in bringing in sources of outside funding. They can do fund raising or try to develop their financial resources in ways that a federally funded park cannot.

Issues related to devising a funding formula: It's all about money, so the issues are about fighting about money, one area to another, between the haves and the have nots. Political influences are paramount because if a congressman or senator has a high funded heritage area in their district, or state they don't want to lose that money. Although we were directed to develop a fair system (for distribution of funds) it's not something that the political person is necessarily going to support because it may be draining some funding away from their locale.

Other issues are definitely fairness. The reason to create a fair funding formula is that you want there to be equitable distribution of funds. There is always going to be an issue of accountability. Accountability is built into the system to be monitored by the NPS national and regional offices.

Procedures for feasibility studies and management plans: There are two ways for feasibility studies. They can come to us from local organizations, as a local study. Or the local area could ask for legislation to be passed to ask the NPS to do the feasibility study. The legislation may give direction on how the study is to be done, but often it is done by the Denver Service Center or the regional office. Regardless of who completes the study, there is a process in place by which the region would review the feasibility study and make a recommendation to the Washington office, and the Washington office would make the determination and send that forward for signature. If it's a local study, it gets signed by us. If it's a NPS study, it goes higher up the line and handled by the planning office. We don't say yay or nay whether this should be a heritage area or not. The determination is: are the criteria met? The *yay or nay* comes in testimony if a piece of legislation is provided a hearing.

Management plans, same thing. The first line is with the regional office if there is a regional coordinator who is able to review management plans. They provide a recommendation to us,

and we make our review and follow through with determination from our office. Are the criteria spelled out in the legislation for the management plan met or not? Sometimes there is some back and forth but ultimately, we are responsible for getting the signatures up through the Assistant Secretary for Fish Wildlife and Parks. It depends on what the strength is at the region at any given time. Sometimes there have been lapses in staffing at the regions and we have taken on that process. If there is a staffer there, we definitely coordinate with that staffer. If there is no staffer there, we will coordinate with the region but there may not be a core person there who is going to take on the review process.

We have a pretty good system now for the reviews of the feasibility studies and the management plans.

I have been flexible on that three-year limit (to get management plans done after designation). If a heritage area is making progress on getting their management plan done and they are not quite finished within their three-year period, some have gone longer than that. As long as they are making progress, I don't want to cut them off because then they never would be able to finish their management plan. We found that to be helpful for the heritage areas.

Sunsetting: If heritage areas reach their funding caps and don't get an extension, they wouldn't be able to receive any additional funding. So far, when push has come to shove pieces of legislation are provided that allow the cap to be raised or the sunset dates to be extended.

The heritage areas do write their extension legislation, but they can request drafting services from the Legislative Affairs Office. The NPS also is very supportive in the Green Book and see what is necessary in the coming years to support the heritage areas. That is sent to Congress, so Congress knows from the NPS perspective we've got these caps coming up and we've got these sunsets coming up. It's our opinion that that should be addressed.

Nobody wants to lose any funding back to the Treasury, so if funding caps are coming up the region will work with the area to spend down their money that they have held on to over the years and could potentially lose. That is something the regions definitely work on with their heritage areas and keep track of. Here in the Washington office, we work a lot with them on their extensions and renewals including the drafting services that Legislative Affairs would provide.

Current concerns of heritage area managers with NPS: A past concern has been with a softness of NPS support. That was shown concretely in early testimony on heritage areas. There was just not the support there for ongoing funding after sunset. In the past I think there had been some concern that the heritage areas were taking money away from the parks. The reason I say those are past concerns is that I have seen a shift. I have seen the parks see how heritage areas benefit them as partners. I've seen strong support from Jon Jarvis in all of his years as NPS director. Legislative Affairs fought for heritage area legislation even when they got a lot of push back from the Office of Management and Budget.

The heritage areas have come a long way from some pretty strong past concerns with the NPS.

NPS concerns about the heritage areas: I'm personally concerned with the divisiveness that has been occurring within the Alliance of National Heritage Areas and that comes down to fighting over money. I'm very concerned about that tearing the program apart. They really need to come together as a united group and promote the program. Especially under the current administrations' proposals to cut us back to zero. We need to have a united front talking about all the positive things that the program does. There has been a reluctance to work together because of this funding issue.

Scaling Up: The heritage areas participated very specifically. There was a Scaling Up conference. The heritage areas came to D.C. and spoke as part of that conference. There have been other efforts that have come out of scaling up, working with landscape conservation cooperatives where some of the heritage areas have come along and spoken with me at LCC gatherings. Annie Harris, Essex executive director, hosted her own Scaling Up conference. There is recognition of the importance of looking at the large landscape conservation initiatives. The heritage areas are doing great work in the area of large landscapes. I'm glad that they are sharing their expertise and their techniques for working in large areas. Heritage areas can be as small as Augusta Canal which is one square mile but as large as Silos and Smokestacks, the northeast corner of Iowa. There is a difference in scale in some of the heritage areas, but they are all dealing with landscape scale resources. Even in Augusta Canal. It is a National Historic Landmark Canal that runs through the city of Augusta. A natural and a cultural landscape that is very important in the city. But other ones literally have enormous landscapes that they are working to preserve and promote and connect with their programs. There are some great examples of the work that they are doing that helps others even within the NPS or other organizations figure out how do you deal in this large landscape universe with your communication skills, with your public participation and things like that.

Challenges: The primary one has been the funding formula. We were charged with coming up with an equitable process for distributing, allocating the funds based on performance. It was difficult to do. We did it. We got the support of the Alliance of National Heritage Areas with a letter from them complimenting the process and providing full support. We coordinated that up and down the hierarchy of the NPS and had full support. It really has broken down because one of the other issues with the program is fighting over money. The political process is not such that folks on the Hill and at OMB who charged us with creating the funding formula are supported by the individual forces that want to protect their own. That has been extremely frustrating to me.

I want to find a path forward with it. I think it makes sense to have an equitable system based on performance. That is the governmental way. I think we should be able to do it.

Successes: Oddly enough, I think one of our biggest successes was crafting the funding formula. It's there. It is well reasoned. It is published. We covered everything we could possibly think of for implementation. It served us well. I think it is a success. I think we just have to keep working on it.

The sustainability project, that has been another long-term project but it's coming to fruition. We also have gotten guidance on that from OMB and from Congress to encourage the areas to

become sustainable. They sometimes use the words *self-sufficient*. We are coming to fruition with three trainings and the guidance that is going to come out of that. It has been over seven years in process. We worked with a consultant to do a survey so we would know where the heritage areas were with their sustainability understanding and sustainability accomplishments. We then worked with another consultant to craft all of that together into guidance that's targeted towards heritage areas. It's not just sustainability planning off the shelf for any non-profit or any government organization. It is crafted for heritage areas, and I think that's really exciting.

The NEPA guidance I mentioned early on. That was a big hurdle successfully accomplished.

The consistent review process for feasibility studies and management plans is something Heather (Scotten) crafted. Heather was our point person on every one of these successes.

Heritage area support of the mission of the NPS: They preserve natural and cultural resources for the enjoyment, education, and inspiration of this and future generations. Cooperate with partners to extend benefits of conservation and recreation throughout the country. Heritage areas do all of that. That is the mission of the NPS, and you could cite examples for each of those pieces that heritage areas are out there doing. I think it's really great that sometimes heritage areas are used as a model for the NPS. Specifically, how to support the mission because of their ability to work with partners and outside park boundaries. It's exciting when I see that happen.

NPS benefit to the heritage areas: What I hear from them is that it is a stamp of approval. Some have even called it the Good Housekeeping seal of approval that helps them with their public, helps them with their local governments. They are associated with a recognized brand and that is extremely important to them. The technical assistance, especially for interpretation, to be able to tap in to the NPS interpretive staffs at the regional level is very helpful. To learn from NPS staff to interpret the heritage area sites is just gold for them and is really appreciated.

It is our privilege to work on this program, myself, Katie (Durcan), formerly Heather (Scotten) and now Liz Vehmeyer, formerly Stephanie Toothman and now Stephanie Stephens and our regional coordinators. It's just a great team. It's a privilege to work with the heritage areas and their staffs. I am very proud of them.