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Sue Pridemore
July 27, 2016

Interview conducted by Antionette Condo
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My Narrative
The Administrative History of the National Heritage Areas Coordinating Office

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Interview conducted and transcribed by
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Working with residents of large landscapes unifying their national story was the most fulfilling work of my career. The work utilized skills developed over time and unique intuitive skills I was most fortunate to already have. Gathering together people who have no idea what they might have in common and then facilitating their conversations required negotiation and careful listening skills. When done well, these initial meetings of the mind began building relationships that assured diversity and multiple perspectives for long-term benefits for their communities, special places, national stories and family-owned businesses.

My personal and professional interest in the unification of story, economic development, preservation, conservation, recreation, interpretation and education into one approach to successful communities began early in my career in the heart of neighborhoods surrounding and encroaching on a national park unit. I began building relationships with park neighbors in the mid 1970's, involving them in preservation, conservation, interpretation, recreation, commerce, special events and resource management while working in Rock Creek Park in Washington, D.C. While not labeled as a heritage area, we developed a process of organizing community members around a sliver of a natural area that snaked through neighborhoods, embassies and the National Zoo so we met with everyone whose property abutted the park to get them involved in their park. We needed the neighbors to care for the parts of the park they saw out their window, and, as far as I know, this was the first time in the NPS that citizens were actively recruited to be involved in park management. We had them doing natural resource management by working with staff on monitoring new meadows we ended mowing wherever we could, developing and leading hikes and wildflower walks, adopting sections of our bike/horse/hiking trails and other opportunities to apply or learn skill sets different from their everyday lives.

When I transferred up to Hyde Park, New York in 1977, I was already in partnership mode. It was easy to establish a precursor to a heritage area even though no one had a formal name for where we were heading. I approached a Girl Scout leader about the idea of adopting the formal garden area of the Vanderbilt Mansion, an area fallow and crumbling since WWII. That became an organization that is still going strong today with working fountains, restored flower beds preserved tool house and a working team of over 200 volunteers and fundraisers. The agency used this approach as a model for partnerships throughout the nation, even featuring it in a national booklet about partnerships.

I worked in Hyde Park, New York twice. During my second stint in Hyde Park, I got information on the 80 various mansions built between New York City and Albany, many involved with the Revolutionary War or the robber baron era along with artists homes. I started getting them working together (nonprofits, profits, state agencies and combinations) through, *Christmas on the Hudson River*, which led to other themed projects, and all began joining me in interpreting the region in a landscape approach, a new and more inclusive approach. An effort to put a trail along the Hudson River running between New York City and Albany began around the same time that the group I worked with formalized around a growing heritage area movement and eventually a heritage area sprung out of those partnerships.

In between the two Hyde Park assignments, I worked with the team creating the foundation for Lowell National Historical Park, developing partnerships with the local school systems, businesses, state agencies and city departments in the administration and implementation of a park that required partnerships to function successfully for preservation and interpretation of the park's story. While not designated as a heritage area, it represents how the agency would profit from such an approach to park planning and development.

Property where FDR designed and built a cottage for Eleanor was added to the park and I was on the planning team for creating a site that became a private/public partnership to preserve and interpret Eleanor's story and to provide a legacy of her human rights activities.

Moving to Scranton to plan, develop and open Steamtown (National Historic Site) provided an opportunity to bring together a partnership of sites in the region, state and local government as well as nonprofits to share resources and visitors. Within a couple years, the heritage area concept became a state-wide program, and the interpretive partnership provided the place to establish one in the Scranton region. From there to a national heritage area was a natural progression.

Early state heritage initiatives were: Illinois and Michigan Canal National Heritage Corridor, to my knowledge, the first time a national designation identified preservation and economic development together; The New York State Heritage Park Program, never properly funded and only state supported during the first couple of years, were placed in economically challenged communities to seed an opportunity for a better future by building a visitor center and furnishing a staff member/community organizer for a couple years; Lowell National Historical Park, because of the federal/state/local partnership; The Massachusetts State Historical Park Program; and the Southwest Pennsylvania Path of Progress, developed with bricks and motor monies but little else. A state economic agency in Pennsylvania studied the earlier efforts and picked out the individual strengths and made adjustments to weaknesses when developing their own state program. I admired their grants program and designation process. They were well thought out and made economic sense for successful development of an emerging area.

I began working in the Delaware and Lehigh National Heritage Area in 1992 where they were halfway through the management planning process led by Deidre Gibson, a park planner working for the RTCA Midwest Regional Office. Deidre created an excellent planning process that provided foundation documents from which an action plan evolved. She first had the consultant firm develop individual inventories of current places, businesses and organizations that could/would contribute to the *five 'tions and a 'ment*; that is, economic development, recreation, education, interpretation, conservation, and preservation. These six documents were integrated to break down silos, together creating the management plan, complete with initial and long-term actions. Deidre was familiar with my work in Hyde Park, Lowell and Scranton and she wanted me to develop and implement the interpretive plan by pulling sites, communities and businesses together to create a strong synergy and long-term partnerships. The person hired as executive director was really good on numbers and took on that as his role.

Being in the right place at the right time with a unique skill set (atypical ranger material) produced many firsts. A team of site managers made up of nonprofits, local and state agencies

joined me to curate the first large landscape interpretive plan. It remains the best one out there, serving as an example to new ones and emerging ones as well.

I formed working groups to hire and guide development of the first large landscape graphics environment. We decided on the regional colors, typography, directional and entryway signage, print materials and interpretive signage. In a document entitled, *Visually Speaking*, this approach became a guide for several heritage areas and other programs, two universities and the New York state parks program that I know for sure used it.

The D&L management plan called for ten visitor centers and even named several communities that could or would host them. There were no specific structures selected, however designing exhibits for a variety of spaces and stories with a variety of challenges such as historic structures, floor space and exhibit opportunities for whomever would need and apply them was the criteria to meet. The flexible exhibit system met all those possibilities yet tied the heritage area together. Paying tribute to the extraction industries, railroads, canals and people, the *Flexible Exhibit System* met all the challenges and was the first of its kind. I applied it to three different spaces, and it worked out beautifully.

Politics removed anything created or coordinated by myself and the many partners, so these three elements were not utilized by the next team of heritage area staff. Print materials did not follow protocol nor did directional signage. Different typography and colors were used, for example. No interpretive planning took place and the three guiding documents disappeared. The Washington office uncovered the interpretive plan and posted it on the national website as an example to others for a while, but it is, once again, nowhere to be found.

All three documents would be excellent additions to the administrative history of heritage areas.

I believed then, and still believe today, that each planned action should be designed to produce stronger partners empowered to continue carrying the torch forward. For example, the interpretive plan coaches the reader, encouraging them to develop their own plan by using it as a guideline and framework. The Flexible Exhibit System presents the methodology on planning and installing an exhibit as well as fabrication directions.

The people who followed behind me subscribe to the same philosophy as the batch of heritage area groups created after the D&L, by considering themselves as the heritage area rather than the places and residents being the heritage area. Funds for the heritage area are spent on themselves rather than on building a stronger sense of place and sustainable, versatile implementation teams as they become the managers rather than the facilitators.

I transferred to the Midwest Regional Office in Omaha in 2002 to use my skills for development of the Lewis and Clark bicentennial planning for a two-year commemoration along the trail. The idea of heritage development and preservation of a place and its unique culture grew out of this region with the birth of the Illinois and Michigan Canal National Heritage Area. Even though the concept and implementation of a heritage development approach that merged the five 'tions and a 'ment into one approach was born here, the regional planners did not embrace it. Three others were created in the region, Automobile, later Motor Cities National Heritage Area, Ohio

and Erie National Heritage Canalway and National Aviation Heritage Area, but nothing was in place to partner with them, coach them or to provide technical assistance. When I announced I was leaving Lewis and Clark, I was asked to establish protocol and processes for the NPS role as partner and oversight agent with our heritage areas. There was none in place anywhere in the country, leaving each designated heritage area to define itself and NPS regional coordination defined at varying degrees of attention, mostly by benign neglect. This was predominantly due to lack of understanding the designation and nongovernmental operations.

I established standard operating procedures for a regional program, reporting directly to the Associate Regional Director, Marty Sterkel. National processes began to take shape when Eleanor Mahoney was assigned to the Washington heritage office. Eleanor understood that there was no national program, and a national set of operational procedures were needed. Heather (Scotten) followed Eleanor and she actually shaped the national procedures. We had some struggles getting there but in the end the results were much better than they would have been if I had been continuing on my own. As the only person working with heritage areas who also had been a heritage area practitioner, I fought hard against the NPS need to make heritage areas fit into the governmental process. Instead, I tried to get the agency to shape the NPS role around the more organic grassroots process. Unfortunately, however, rigid budget staff were unwilling to work with heritage area staff to find a winning solution for using federal funds to meet the legislative mandate of each heritage area.

Policy task group of 1997: Susan Moore, Jim Pepper, and I were the only ones of the group who were working with heritage areas. Two of them directors, and me as a heritage area practitioner (Interpretive Specialist, Delaware and Lehigh National Heritage Corridor). The NPS was trying to take a square peg and whittle off the corners to make it fit into the NPS hole. They used the agency definition of a site plan and listed the same requirements for management planning. Jim Pepper and I kept trying to explain to them that each heritage area had its own individual piece of legislation, individual laws, individual needs and partnerships. Development of a long-term successful national heritage area required establishing a recipe for a process that would build successful long-term implementation teams. The teams would integrate interpretation, recreation, preservation, education, conservation and economic development, five 'tions and a 'ment, to assure a viable living space within a treasured national story, also known as a living landscape. Instead of embracing this concept and applying it to large landscapes where our national park units rested, they stayed in their comfort zone. An arduous management plan that bore little resemblance to establishing a successful process was the outcome, placed in every piece of legislation for all national heritage areas that followed and then used as the approval measurements. Heritage areas, instead of building their planning and implementation infrastructure, spent around \$400,000 meeting federal requirements that did not place them into a viable process. This NPS outcome still haunts the planning process even in 2017. We failed them as a partner then and continue failing them as a partner today. Even worse, the agency could have positioned themselves for a stronger preservation/conservation and economic future then instead of continuing to watch precious few resources dwindle away without the regional coordination team in place representing the five 'tions and a 'ment, necessary components.

Criteria for a successful heritage area: Preparation for designation/feasibility assessment. Pre- designation is the most significant time in a successful heritage area's future. During this

period, conversations, debates, evaluations, inventories, partnerships and financial resources are gathered together. The most important ingredient for setting up a storied region to become a successful heritage area rests with the makeup and functioning process of the coordinating team being built around blending the six necessary components by strengthening the individual sides, communities, family-owned businesses and large industries.

The National Park Service pulled regional coordinators, no matter their familiarity or understanding of one of the most important components of the process, together to define a set of criteria against which to measure how prepared a potential heritage area might be to move forward successfully. The group, all NPS staff rather than the field practitioners and the NPS, instead of using layman's terminology, used the agency's terminology to refer to it as a feasibility study. That terminology did not clarify to the potential areas' coordinators that it represented documentation of the rigorous work required to prepare for designation. Without that rigorous work of preparation, they would founder after designation and/or fail to launch.

The best assessment for their preparedness, NPS term is feasibility study, is when conducted and documented by an impartial group. Initial results would provide the area's coordination team with a roadmap for completing their preparation. It would weed out tourism-based areas lacking the preservation/conservation components, for example, a key ingredient for a region that embraces their national story as part of their economic strategy. Preparation strategies would identify where in the regions, experts in the six disciplines either existed or could be developed. Instead, the assessment was treated by the region's promoters as a report and a rigorous review of the document took the agency several years to attain. Eleanor Mahoney began the push from the Washington Office and Heather Scotten took it to fruition. I'm retired now so I cannot assess what is happening at this point.

Those heritage areas that got designated by political expediency have never really gotten off the ground, not because they lacked the interest but because they had not prepared prior to designation. Those that took the time to evaluate what the feasibility study was actually asking of them were better prepared. Unfortunately, however, consultant firms who claim to specialize in preparing these studies are unfit to do so, mostly because their sales pitch is based on successful designation rather than producing a better roadmap for successfully preparing for designation.

That specific planning process and that detail of communication are critical to success. No one should awaken one morning to discover they live in a region designated by the federal government as important without understanding what that means to them specifically. They must understand that unless they sign on as a participant, they, and their family and properties, are not involved in any way. The communication, in many cases, will be between two people, rather than a gathering of many. Face time with sincere debates, discussions and dialogues.

Funding: Most teams that contact the NPS offices seek designation because they expect a flow of federal funding of one million dollars a year. Even when told otherwise, they feel confident that they can gain financial support through their legislators. Typically, it is the tourism people who want the funds for promotion, with little regard for the need to prepare the special places

and communities for it. Without that preparation, tourism erodes the uniqueness and the fickleness of being *the in place* may be a momentary hit.

Successful funding is when about 10 to 15% of the budget is federal money with the match divided between donated goods and services and real cash. Cash on the table from all involved. No project should move forward without real cash on the table because when people donate goods and services, they are invested but not for the long-term but for immediate results. If they put cash on the table then they have invested in a long-term future. The reason I don't believe that we should put a lot of federal money into any particular project is because nobody is responsible for long-term outcomes when the feds have paid for it all. You'll see a lot of way signs in the ground that never get replaced when they start looking ratty. The trail put in and not maintained. You'll see directional signs put in and no routine maintenance involved or a long-term replacement plan. You see those types of outcomes because there is no long-term investment and many times also a lack of skin (recipient money) in the project/outcome.

Long-term planning/sustainability The NPS understands long-term planning better than most. For a region to be successful, the potential heritage area coordinators need to understand it as well; when the coordinators bring representatives of the six disciplines together for each project and develop an implementation plan that also assures long-term sustainability of the outcomes.

Used to laying down policy, the agency held several meetings with heads of the coordinating entities to assure they understood whatever the agency needed to have them do so the agency would be comfortable with them. It took many years for the agency to begin assessing training needs, expecting entrenched management leaders to change into the more successful approach.

The top-down chain-of-command paramilitary agency is still unable to understand the difference between coordinating the heritage development process and managing it. Those that operate as management entities have large staffs made up of subject matter experts, make the financial decisions themselves, use the heritage area name themselves and only consider any excellent steps forward that take place as those that they themselves managed. Their projects are initiated from within the organization, board members or long-term committees focused on one or two of the disciplines.

Those that consider themselves coordinating entities build their specialists by empowering their communities and special places with needed skill sets, teach their partners long-term planning skills and have projects grow from teams representing the six disciplines. The coordinating team sets standards and brings teams together to develop long-term plans to achieve them.

Implementation strategy (NPS term is Management Plan): While preparing for designation, the partnership team(s) are developing processes for moving forward, defining how to implement, measurement criteria, what success looks like.

Qualities of a successful regional coordinator: Number one, they need to understand community and long-term planning. Number two, they need to understand and be able to do effective meeting preparation, so they are focused, efficient, productive, robust with differing perspectives and multi-disciplined. Number three, they need to be a good teacher, a good leader

by leading from behind and good at building skill sets. Number four, effective listening, so the coordination of partner teams is targeted, and nuances defined. Number five, understand the government process of funding to the point where they know where there is flexibility and room for negotiation. Number six is having excellent negotiation skills. The need to hear out differing needs and definitions of success is vital to long-term success. Building implementation teams around long-term results requires teaching them to accept differing perspectives as important and productive. If everyone in the room is easily in agreement, they have the wrong people in the room. Differing perspectives typically push everyone harder to discover a larger and more successful outcome.

The NPS role: Help the heritage area organizers train others to work effectively within their partnerships. Assist them in developing the request for proposal for locating the best team for their assessment of readiness. When the agency is charged with the assessment, make sure at least one team member has worked in a heritage area. Address the current feasibility assessment guidance to assure the deliverable provides a roadmap for preparation of a carefully developed strategy tailor made for that specific region.

We need to define our role as partner in the long-term relationship as well as being the financial administrator. Instead of seeing the cooperative agreement as only transferring funds, we need to see it as defining our roles both as partner and for our technical assistance/training. Teaching them how government works, the role of Congress, the importance of their enabling legislation and the difference between managing and/or coordinating, (fishing for them vs teaching them how to fish).

It is important to encourage them to initiate implementation projects. It is necessary for them to know their skills, roles, goal, guiding principles and teamwork are road ready. We need to assure them that official designation is not required to be a heritage area. They just need that designation to perhaps, maybe, possibly, see some federal funding. The process/recipe for success is what ties a region together around a story and when done well, provides a stronger economic base for a better future.

In terms of the funding for the individual heritage areas, the regional coordinators have absolutely no input. It would be nice if we did. For example, in North Dakota, we had a heritage area established by two people who knew a senator, got designation and agreed that they would split the money 50 50 between their two nonprofits. That is an example of why the regional coordinator needs to be involved in the annual work plan. Approving the projects and assuring the projects using any federal funds meet the criteria within their enabling legislation and in their approved management plan.

The regional coordinator has to be hands-on with the development of the implementation plan as a partner at the table. We, too, can offer training and other great resources.

Plans: Feasibility Assessment. I addressed this in other sections, but it deserves the spotlight here. The National Park Service is a reactive agency. While staff in the field identifies needs and addresses them individually, the agency has no process in place to track these, identify needs and then address them in a holistic manner until it creates a huge budget hole. National Heritage

Areas provide a microcosm for studying the agency and where it succeeds and fails. While the idea of creating a safety net for a nationally important story in a living landscape grew out of the Midwest Region, they still do not embrace the concept, the opportunities nor the networking heritage areas present. In reality, nor does the rest of the agency. There have been many false starts, but no real launching process. This is painfully clear with how they staff and utilize the program in Washington DC and each regional office. It is even clearer when you observe what conversations bring in this integrated economic storied spiderweb.

The nation can no longer afford to build a bookmark to a story, a park unit, and have the agency tell it by ourselves. Yellowstone, for example is down-wind and downstream; the wildlife, flora and fauna do not remain within arbitrary political boundaries. Interpreting, maintaining and balancing the ecosystem requires cooperation and coordination with neighbors and far-reaching political entities. When we are given a site in town, such as Abraham Lincoln's home, we either buy up and maintain the neighborhood or we take our chances with homes in the neighborhood such as Martin Luther King's home. The heritage area approach is perfect for all new areas, but we are not using it because we never took the approach seriously. Had we, the, feasibility study, would have been developed as a set of guiding principles with measurable goals and objectives. We would have taken that same approach to build out the planning documents for new park units.

Management Plan: The agency, having never studied the process behind the National Heritage Area title, ignored those in the room most familiar with process and created an expensive planning requirement that offered the newly established area little structure for moving forward. What is really needed is an implementation strategy with milestones, definitions of success, measurement tools and criteria for partnership, funding, donated goods and services and interpretation. It needs to clarify the story and grant measurements for both application and outcomes.

Sunsetting: The funding bill sunsets but the heritage area remains. Unfortunately, once again, the agency refuses to recognize this fact. The NPS also removed them from the list of affiliated areas. The NPS has unevenly worked with the coordinating entities as a partner, and, also as the grant's administrator.

Many, many, many bills that pass Congress have a sunset clause. That sunset clause has always meant we need to revisit this and see if adjustments are necessary, to see whether or not it has been successful, and whether or not it's moved forward in establishing a permanent and seamless national story. It's the difference in being a program or being a permanent part of NPS. The RTCA money, the SOS money, the underground railroad money, all of those are programs and they all have specific shelf lives.

If you look at the rollercoaster ride their position in NPS has taken, you will see a back-and-forth movement that demonstrates how little the NPS understands the role the heritage area approach should play. The first several national heritage areas were affiliated units, giving them each individually a permanent place at the national heritage area table. While Denny Galvin was deputy director of the agency, he placed their budget within the agency's budget and kept them as affiliated areas. Until then, they were legislative initiatives (pork barrel) funds. The NPS then

asked for little funding so the heads of each *management entity*, we gave them that title, the initial legislation for the first heritage areas recognized their role as *coordinating entity*, convinced their federal legislators to separate their funds from agency funds.

The funding sunsets are supposed to be reviewed, and then those who meet the requirements should have their funding authorization renewed, unfortunately however, because the agency fails to understand the heritage area process, definition of success and how to professionally evaluate programs and processes, this was not done. Even when we hired a firm to develop an evaluation process, our lack of knowledge in this area allowed us to accept an inferior shallow process. If the NPS actually understood the definition of partnership, heritage areas could be affiliated units.

The parks that are in successful heritage areas can blossom through the coordination of program and conservation and interpretation. In a few examples, you will find what this looks like but that is rare. We do not understand the real definition of a partnership so only superintendents who learned that skill outside the agency have developed a successful relationship. Even in those cases, however, the agency has no process in place to assess those relationships and document those results in the mainstream agency. The whole national heritage areas program, process and successes are siloed.

The original plan was that the heritage areas would not disappear but that they would, after a specified amount of time, no longer receive federal funds. The federal funds were to be seed money for projects.

Relationship of Washington office and regional office: As long as there was no Washington oversight of the program, as long as Washington was not organizing the program, the regional coordinators either worked as they saw best with the heritage areas or just maintained the status quo. I developed regional protocol that I followed and eventually was able to go around my supervisor to get it approved by the regional director, Ernie Quintano. I shared it with other regional directors, but it was never read or assessed by any of them. It did make a couple of agendas but never was addressed. I also developed a method for our regional grants program and spent three years getting the contract office on board. Theora McVay was the only contracting officer in the agency who understood the role of their enabling legislation, the ten or fifteen-year term authorized and what needed to be dropped and added to the cooperative agreement process to assure we all agreed on their individual legislative requirements. Washington failed to understand the import of assuring the cooperative agreement suited the program and for each heritage area therefore we were all forced to apply a five-year cooperative agreement filled with unrelated requirements and missing those needed. Once Theora retired, that was the final straw, and I gave two-weeks' notice to retire.

Although I was a heritage area practitioner, others who did not even understand the process, their definition of partner, what tools were needed, the role we could play prior to designation to weed out those that would never be successful and such, outnumbered me and the elements really needed were those coordinated by Eleanor Mahoney and Heather Scotten. Even for them, however, the agency made their work challenging.

I saw that we needed to have structure and a process in place that gave the heritage areas something that helped them be successful. I just worked on helping them be successful. Out of that came some SOPs and that kind of stuff. In some regions they decided that they needed to assess their money. They were going to control them through their money. Other regions were just a funding pass through. Every region handled heritage areas differently.

Martha Raymond has been phenomenal at handling the concrete part of the program, budgeting, reporting on outcomes, coordinating the current written evaluation process and working within the political structure in Washington. She has understood the need for more structure and supported their development.

Because each regional director has the reins for defining the role the national heritage areas play within their region, the regional programs fluctuate. Currently in the Midwest region, they have little status, and the program has had little to no attention since my retirement. The position has gone away. The technical assistance has gone away. The role as partner has gone away. Oversight has gone away. There has been someone assigned to sign off on reimbursements but no one to assess success or failure of the federal investments.

Challenges: How a heritage area's coordinator manages clearly defines whether or not they see a role for the NPS other than just give me money and go away. If the structure is person based where the power rests in the hands of the CEO or director, they define their own role and NPS can't really get to the table except through the annual work plan. Through that we can approve the projects that have federal money involved. Every single heritage area designation legislation includes NPS oversight.

If the coordinator, national or regional, has worked in heritage areas and understands that even an annual plan has to be flexible because the interests and quantity of area partners changes where the money is coming from and what the priorities are. You have to have a plan that is flexible enough to allow for changes in order of projects, sometimes additions of projects not previously listed but which promote the overall themes of the area.

Since the legislation authorizes funding over five or ten or more years, the cooperative agreements should be for the whole five-or-ten or more years timespan. The regional coordinator has to try to find ways to continue to carry money over for projects that are not completed by the calendar year in which they were expected to be reported in that annual report. Or, convince the NPS grants' office that that work plan does not exclusively pertain to that particular year.

There was a work group on administration. I had put together administrative guidelines that I was using, and we had a talk about doing a national set. I sent out what I was doing to all the regional coordinators to say that this is what I'm using right now. I got eaten alive for doing that and for trying to force it down everybody's throat. Then a task force was organized to work on it and the head of it who had been an environmental quality person for the Department of Transportation put it together in a very governmental way and included stuff in there that did not meet their legislative requirements and then it basically never went anywhere. I just continued using mine.

Distinctive vs significant: Distinctive is recognizing the political piece of this. Significant is the definition that the program deserves. It doesn't water it down. If we could stick to it, we would have a program worthy of the designation, national. But when we say distinctive, there is no way to define distinctive other than to say, 'Oh, sure you made that'. Significant is defined by our park assessments. When we assess a site for acceptance into the national park system one criteria is whether or not it is significant. So significant is defined by the NPS. In my mind, if they are to be part of the park system, which I believe they should be, that significance is important. Distinctive, 'Yah, take your ten or fifteen years and then get out of here'. You got designated for political reasons. You did not get designated to be part of the system. I really do believe that we need a system of National Heritage Areas. If we had a system, it would be part of the park system, like National Trails are, like Wild and Scenic Rivers are.

NPS interest in heritage areas: Once Deny Galvin retired that was the end of the support for the heritage areas. Jon Jarvis says he is, but actions don't support that. Some of the park superintendents have been supportive and benefited from it. They have developed ways to truly partner in a meaningful way that is good for the heritage area and good for their park.

Evaluation: An assessment of success needs to look at individual projects. How many of them brought money to the table? Within the heritage area how many of them got partners to put money in as well as rolling up their sleeve? It is okay to do some projects that don't have money on the table so the evaluation should be individual but spread out over the whole work of the heritage area. How many of the projects were for the long-term and how many processes were put into place during the planning process that assured their continuity and longevity? Federal money should not be for a short-term fair. Our tax dollars need to be for long-term success.

Evaluation should include how do they define their partner? Needs to look at whether or not over time they added partners or is it just the same crew. Did they continue evolving as a heritage area, or did they only continue to look at a handful of places they identified in the very beginning? Did they continue building a heritage area or are they just a place of sites? Did they take the *five 'tions and a 'ment* and blend them together into a successful place with significance? How did the projects show benefits for the whole, not just the one place? Continued to build their story and tying more places together to develop it.

We need to look at how the organization itself works. We need to look at their success as a long-term thinking board or commission: how they establish priorities; how their plans look for bringing in new money; how they recognize their partners, encouraging them to keep moving forward; how often they look back and assess long-term results, not just immediate results, but look back and see what other outcomes took place over time from the first initiation; how often they assess their plan and make adjustments to it to make sure they are moving forward as their world changes; and how they are doing on their five 'tions and a 'ment and blending them together. Some of them are subjective but it is up to NPS as an agency to make sure that the coordinating entity will last. If they are not long-term and a strong board to go long-term then we need to be worrying.

Management plan: I don't think a management plan should list any specific project except as an example. I think it should define how you develop a successful project. Implementation of a management plan is the implementation of a process. It needs to be the go-to book for how to. How to do this, how to measure that. It needs to be their game book.

Management plans are evolving. NPS made them be written into legislation.

But calling them management plans is a misnomer. Management plans is not what the coordinating entity is supposed to do. They are supposed to grow the partners. We stopped calling them management entities and called them coordinating entities. NPS began to change the definition of what that entity was supposed to be and look like and act like. We were so used to a top-down management process that we put that right in there (the legislation) for the coordinating entity and that began to discolor the process. Because at some point in time the coordinating entities themselves may go away but if they have done their job right there should be a unified body of people who are preserving, interpreting, and conserving. But something that has the title of national heritage area continues to exist.

Cooperative agreements: Should not be standardized and should be pulled right from the designating legislation on how the money should be used. No one with any background working as a partner side-by-side within a heritage area was part of their development or even of reviewing them. Instead of being the tool they are supposed to be, they are filled with things totally unrelated to the program. Useless. It's unfortunate.