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**Eleanor Barbara Mahoney**  
**July 14, 2016**

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

Eleanor Barbara Mahoney  
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Interview conducted and transcribed by  
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This transcript was reviewed by Eleanor Mahoney

**Eleanor Barbara Mahoney Interview: July 14, 2016**

**Interest in heritage areas:** I had just finished my master's degree in public history at Loyola University in Chicago and one of my professors had worked on the Illinois & Michigan Canal National Heritage Corridor. He was a friend of Gerald Adelman, who was with Openlands, one of the forces behind establishing the corridor. As part of our class, we visited the Corridor. That is how I found out about heritage areas. Also, my grandfather is from McDowell County, West Virginia, which is in the National Coal Heritage Area. I had visited some of the sites in that heritage area, so I knew about those two areas and that interested me.

**Assignment in the National Heritage Areas Coordinating Office:** I worked in the NPS National Heritage Areas Coordinating Office from June 2007 to May 2009. I did all different things. I was first hired as an intern. I took over Suzanne Copping's position when she left. I worked on the newsletter and other publications, on the unigrids, did responses to Congressional inquiries, worked with regions that were interested in becoming heritage areas, made presentations, reviewed feasibility studies and management plans, worked a lot with Alma Ripps of the Legislative Affairs Office, and on the early issues of the evaluation process.

**Funding allocations:** Before I came to the program in 2007. There had been a continuing resolution and some people in the NPS, probably Joe Wallis and Jan Mathews, created a formula based on different factors to divide the heritage area funding. Before, a lot of it had been based on historical appropriations or different members of Congress advocating for the particular area in their district. My role was more a liaison to the heritage areas once the formula was in place. Everyone wanted to find a solution, but it was never achieved. The biggest challenge was transparency. The creation of the formula had not been transparent so, people were upset about that. Also, the amount of funding the different areas received changed as a result of the formula and the heritage areas had been budgeting to receive different amounts. When they got a lot less than expected that was also very difficult. Some of them had to lay off staff and cancel programs. The challenge of the program is that more areas were being approved by Congress, but the funding was staying static. There had to be some change in how funding was allocated but it wasn't a transparent process. That was one of the things that people were upset about.

The formula was based on similar factors of how NPS would fund the states for preservation offices. Based on how many square miles the heritage area was, what the population was, how many national historic registered properties there were, if they had a management plan, and a few other factors involved. Much more based on things that could be counted, quantitative factors. Previously the funding had been determined, in large part, by how much money your member of Congress could allocate. It was a big change. That was one of the shocking aspects of it. It happened very quickly. There were all different people involved in the heritage area program and at times it seemed as if there were decisions being made by either leadership in Cultural Resources or the Budget Office that weren't necessarily transparent even to other people in the NPS let alone to the heritage area partners. Something was going to have to change. But the manner of the process really caused some antagonism among the people involved.

**Relationships within the NPS:** I didn't interact with Jan (Mathews) or Joe Wallis or Mary Bomar or Jon Jarvis, that would have been Brenda (Barrett), Ed (Clark) or Martha (Raymond)

but I interacted a lot with the regional coordinators. Suzanne was in the Northeast, Chris Abbett in the Southeast, Linda and Gretchen in the Pacific Northwest, Greg Kendrick in the Intermountain, and Sue Pridemore in the Midwest. I interacted a lot with all of them. We had regular conference calls every month or every few weeks. We met a couple of times because we were always talking about management plans or feasibility studies or funding. We were always working on feasibility study guidelines or management plan guidelines or members of Congress had questions. We were in contact all the time.

Depending on what the heritage area's authorization stated, some of them had a closer relationship with a park unit than other ones. Sometimes the authorizing legislation could say you will work with this park unit. In theory, most of the heritage areas, not all of them, had a park unit that they partnered with on issues and often there was a budget person in that park office that would help with the budget stuff and then the regional liaison had the responsibility for the management plans and the feasibility studies.

To have as strong a relationship as possible with the NPS is good for the heritage areas. They are affiliated areas. It also raises the profile of the heritage areas within the agency if they partner with park units and it is beneficial to the park units because the heritage areas often do more outreach. They have the capacity for outreach and marketing beyond the park boundaries. Their themes are a little more expansive. Park units are restricted sometimes with their authorizing legislation, whereas heritage areas authorizing legislation is often broad and can encompass a lot of themes and time periods. Park units don't usually have that flexibility. It benefited both the heritage area and the unit. Parks have a lot more funding and bigger staffs and two or three interpreters or training in historic preservation or natural resources management whereas heritage areas may not have that many people so that could help the heritage areas as well. The regional office helped navigate the bureaucracy of the NPS as far as funding and getting the different documents approved.

There was a lot of disagreement at the time whether heritage areas had to go through the NEPA process for their planning and when they did the NPS regional offices helped a lot with that. The categorical exemption from NEPA came through at the end of my assignment there. They still had to post some of their documents on something called PEPC and the regional office helped with that too. Some of the regional offices worked with the Denver Service Center for their planning and the Center assisted with the more bureaucratic side.

Starting in 2008 a million dollars was taken out of the overall heritage area budget and given to regional offices and the national office to help with the coordination. Other regions had done that previously (used a percentage of the allocation), but this was the first time that it was written into the congressional appropriation that money would be taken from the heritage area appropriation to pay for those positions in the regional offices and the Washington office, I think.

The regional offices released the annual appropriations to the heritage areas. In the Washington office, often there was only one person, so we were seen more as the liaison to people in Cultural Resources or the Comptroller's office or Congress or to the Policy or Congressional Affairs offices. We were seen as the entity that could be the conduit for other WASO offices.

There were a lot of questions (to the Washington Office) about feasibility studies for prospective areas. What were the criteria? The regional office responded to those too. We'd work with the regional office on study and planning questions. The legislation would say they had to have x in their management plan and the regional office and myself would review it and ask them to add or subtract from their plan as seemed appropriate. One of the requirements was public engagement and we would advise them on how to get more public involvement, e.g., planning meetings and things like that. Or how to promote the heritage area on the web site, that was a big thing; strategizing how to get the heritage areas more exposure in the agency overall or with Congress.

**Management plan guidelines:** The person who drafted the guidelines was a contractor, Ann-Ariel Vecchio. My sense of why it is still in draft, as are the feasibility study guidelines, is because there is not a specific path that heritage areas need to follow. Creating guidelines are probably better than creating hard rules because the heritage areas are so different, and their authorizing legislation is different and it's difficult to create a set of requirements that would really apply to all the different areas. Parks are different too, but they are always in the same funding structure in the agency, and they are all federal entities. Whereas the heritage areas have different management structures, different geographic ranges, goals, so it's really hard to create any one set of documents that can encompass all the diversity of 49 different heritage areas. That's one challenge and then the office is so small there is not one person just focused on policy. That's also a challenge. People have so many responsibilities it's hard to have one person spend a lot of time on something like that.

**Policy changes:** During my time we and the regional offices worked with the planning office, Tokey Boswell, his boss Patrick Gregerson, and others on not requiring the heritage areas to do an environment assessment (EA) or environmental impact statement (EIS) as part of their management planning. They got a categorical exception under NEPA. When the management plans were originally done, they still wanted people to go through the EA but over time it became clear that that just didn't make sense for the management plans. The individual projects yes. Not the management plan. It was an expensive, time consuming thing that just didn't apply to heritage areas. The management plans were so broad, there weren't specific actions so an EIS wouldn't be applicable. That was a really big change to the planning process.

**Feasibility studies:** It varied as to who did the feasibility studies. Sometimes Congress would get legislation passed for the NPS to do it. Other times it was the entity within the community such as a university or they would hire a consultant to do the study. Every heritage area was different. It just depended on the area. It was all across the gamete.

We were using the draft feasibility study guidelines to evaluate the feasibility studies. That was probably the main criteria we were using.

**Property rights issues:** We got a few requests about property rights from Congress particularly from Tom Coburn, the Senator from Oklahoma. Sometimes at specific hearings for heritage areas there would be a person testifying about property rights. In the west there was a potential heritage area moving forward in Oregon and maybe they didn't get as far as they wanted because of property rights concerns. It is very clear in the authorizing legislation that they (heritage areas) can't use federal funds to buy property and the legislation gives no regulatory authority.

There was never any substance behind the critiques although there were people concerned. Once people looked into it, they realized that it was a completely non-regulatory designation.

**International subcommittee:** I lived in France for a while and there is a program there called Regional Nature Parks. They are very similar to heritage areas in several ways. The French approach to land use and land management is different than in the U.S. but the models are actually pretty similar. When I was there, we worked closely with some Regional Nature Parks in France. Four of us went to France for a big conference of the Regional Nature Parks and we presented on heritage areas and started an exchange. People in the Regional Nature Parks came to Pennsylvania and visited several heritage areas. Annie Harris at Essex partnered with one Nature Park and Dayton Sherrouse at Augusta had further exchanges. It was neat to see there were similar programs internationally. It was a good learning opportunity for both sides.

**Needed information:** Maybe not training but more interchange. NPS staff to visit heritage areas and meet with the staff there and learn about how they function, what their goals are, how they partner with park units, how they enrich and broaden the appeal of the NPS, what parks can do beyond the boundaries of a unit. That they are doing similar things as a park does but at a different scale and with different types of resources. Those who work in a park unit that's not necessarily directly connected to a heritage area are just not aware of what they do and how they can enhance the mission of the NPS.

Having NPS staff visit heritage areas and having heritage area staff at NPS meetings would be very useful. Looking at the different heritage area models and seeing how close they are to the NPS and evaluating how the different ones have prospered would be useful for NPS people to read. It's a big difference if you are working for a NPS unit and you are working with a heritage area that has a federal commission than if you are working with one that is run by a non-profit or a university. So that can vary a lot too.

**Benefits:** There are a lot of different ways the heritage area and the NPS benefit each other. The staff that work at parks from law enforcement rangers to GIS to interpreters are some of the most highly skilled people in those areas in the country. It's incredibly hard to get a job with NPS. It's so competitive. People who apply are so knowledgeable in their areas. That knowledge definitely helped the heritage areas in their projects and also the reputation of the NPS. The public really respects NPS. For the public to know that these heritage areas are connected to NPS is beneficial to the brand of heritage areas and to their marketing. So, both the technical support and the outreach and marketing and the funding that comes through are really significant. NPS staff do a lot in terms of planning, feasibility, management and interpretive plans. Sue Pridemore in Midwest had a lot of interpretive experience and she helped heritage areas a lot with their interpretive planning and implementation. Suzanne (Copping) of the National office was very hands on.

The heritage areas broadened the NPS mission to reach many more communities; made its footprint so much broader. Some park units are very specific, e.g., Steamtown. But it's in the Lackawanna Heritage Valley, which is able to expand its story, with coal mining history, trails etc. They were able to enrich each other. Some of the NPS units would get a lot more funding

than the heritage areas and were able to partner on different initiatives. There are many examples of the active partnerships of park units and heritage areas.

The relationship between the heritage areas and the NPS national or regional offices could often be tense especially around the funding formula. If Congress had just given the money to the heritage areas. There is also the tension of NPS as a granter, a partner, providing oversight, a watchdog. Those are all different roles, but the NPS is being asked to be partner, funder, and evaluator and I don't think you can be all those three roles. That is one of the big tensions. What is the exact role of the NPS? It's shifting and changing, a challenge of the program.

The heritage areas had been doing these pretty big conferences. The last one, I think, was in 2007 in Detroit. They were successful but also draining of resources. The conferences were interesting. I think that was a good model.

During my time the regional offices and the Washington office started working better together. We had a retreat in New Mexico in 2008 that went really well, a face-to-face meeting. I went out for a month and worked with the Northern Rio Grande Area and that was a really good experience for me to go into the field. That is something the NPS staff should do. A detail for a month or two would open people's eyes to how it is to work for a non-profit, or other entities related to the NPS. Strengthening the Washington and regional offices relationship, working with the heritage area on the ground, and trying to work through the knotty issues of the funding formula were all during my tenure.

People expected things to change after the 2008 election, but the same issues continued to take place. The heritage area program is a political issue but not necessarily partisan. Heritage areas have both Republican and Democratic supporters. People on both sides try to cut the program. Bi-partisan supporters and non-supporters.