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Heather Scotten Passchier
November 23, 2016

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

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This transcript was reviewed by Heather Scotten Passchier

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I worked at Yosemite National Park, and while I was there in the history-landscape-architecture program in 2005-6, the chief of that program, Dale Humphrey, had worked at Cuyahoga National Park and had worked with Ohio and Erie Canalway. I was really interested in doing landscape scale work that looked at historic resources and natural resources but also looked at the needs of communities and engaged communities in landscape work. He said, hay, have you heard of this program? It already exists, it's called national heritage areas.

At that time, I was entering graduate school at the University of Oregon and I decided to focus my master's thesis on heritage areas and at that time I had worked a little with Eleanor Mahoney and Brenda Barrett who were in the program then on identifying potential topics for master's thesis. What I ended up focusing on was an evaluation of Yuma Crossing Heritage Area. Yuma was the heritage area that was the closest to me and I developed my own methodology to do an evaluation similar to what the requirements from Congress were at that time to undertake evaluations of some of the heritage areas that were coming up for sunset of their federal funds.

The idea was to get some real good applied experience in the evaluation realm but also to learn a little bit about how these things worked and learn a little bit more about the program. That is ultimately how I ended up coming here. I used the master's thesis and my planning background to reach out to Martha Raymond and she had some positions available that I applied for. Originally as a contractor working for the National Conference of State Historic Preservation Officers (NCSHPO) for a year and then moved into the federal position.

I was interested in the concept of heritage areas but hadn't heard of them until I worked at Yosemite. NPS runs about 54 different community assistance programs. Most of the public doesn't know much more about the NPS than the park units.

I worked in the National Heritage Area Coordinating Office from July 2010 through December 2016. We do a lot of different work that falls into five overarching buckets. I worked on feasibility studies, both NPS lead or community lead studies; management plans for the designated heritage areas; communications, social media and our web presence; funding and our data collection process for funding allocations; and on the evaluations. That has decreased over the years as Katie (Durcan) and Martha (Raymond) have developed more of an expertise in the area of evaluations. Our role here is to provide guidance and technical assistance.

Feasibility studies: We don't do the work (of conducting the feasibility study) but I joined study team calls, I reviewed drafts, and I helped folks with their methodology. Then I coordinated the national review process when we have subject matter experts come in to review the study to make a determination: if there is a nationally important story; if there are enough nationally important resources, cultural, historic, and natural; if there are opportunities for conservation and education; if there is public support; if there is a coordinating entity with the financial and organizational capacity to manage the heritage area; and if there are partnership opportunities. It is a pretty robust study process and usually teams need some guidance about how to structure a study. We have feasibility studies going on at all times. We have some studies led by the NPS. Congress directs the NPS through an act to do a study. We have community led studies going on throughout the country.

In addition to undertaking a study and determining that the ten points of our feasibility study criteria are met or not the area is also to work hand in hand with their congressional representatives to make sure there is support for introducing a bill. All these study teams are also working with Congress with the exception of the NPS. There has to be a local champion. The NPS only gives testimony when invited as to whether the area has met the criteria or not.

It is very hard to get a bill approved by Congress and we haven't seen any new heritage areas designated since 2009. Based upon what I have seen when we are invited to provide testimony, people are asking questions about the cost, which is a reasonable set of questions. They want to know how much money each heritage area needs but also what is the cost of NPS to administer the program. I think these questions are all reasonable. We have seen some reticence to designate new ones particularly when we haven't had a lot of the heritage areas move on and be fully self-sustaining. We still have 48 areas receiving federal funds. (54 as of 2019)

There are currently feasibility studies going on, with a number of studies completed and those groups are still working to get legislation introduced or maybe they have had legislation introduced and they are trying to work with their congressional leaders to get it approved. That number is a little harder for me to estimate because sometimes people just lose stamina. They just disappear.

Funding: One of the things we took on a few years back was to address the direction from Congress for NPS to develop a performance-based funding formula. There was a separate directive related to self-sustainability plans for heritage areas. We grouped these directives together and used it as an opportunity to revisit our funding formula that had been used by earlier national coordinators. We tried to develop a formula that met a series of criteria. It was performance based, was equitable, was fair and was justifiable.

We developed a whole process to do this. The process included a team of NPS subject matter experts who had a lot of experience with heritage area funding and also funding and budgeting in general. We led a series of web-based workshops for the heritage areas and their park partners to learn about the project and provide their individual feedback to us. We worked closely with an economist to develop some preferred options for how a funding formula could work that we then introduced out to the heritage areas and their park partners for comment. We hammered home that we were looking for individual feedback. We weren't looking to achieve consensus, but we wanted them to understand the analysis that went in to structuring a new formula.

In 2013 we wrote up a plan. We called it a plan because we weren't sure there was going to be support from the Hill for this new formula. It basically outlined how the formula would work and then a three-year phase in of the performance and eligibility requirements whereby the third year all the heritage areas would be moved into the same funding formula. We did that because over the years there has been growing tension among the heritage areas because the older group of heritage areas receives much more funding and the newer heritage areas receive a lot less. We were trying to develop one formula that everyone could move into. It did provide for proposed decreases to the older heritage areas in some cases, particularly if there wasn't funding to cover what we call our performance tier. Meaning they would meet certain eligibility requirements. This plan was not accepted by Congress. Every year since 2013 when it was launched Congress has directed us not to implement the funding formula.

We still have some heritage areas receiving $700K a year whereas others receive about $300K annually. So it's a big difference in funding levels.

NEPA (National Environmental Policy Act): I mentioned that I am responsible for reviewing management plans. Providing technical assistance to heritage areas and coordinators on management plan methodologies and associated things. What we were seeing were plans in which every heritage area essentially had to have an EA (environmental assessment) included for their NEPA requirements which seemed like a blanket requirement. Each region didn't know how to address the heritage area plans and each region was only looking at their plans. We decided to look across all the plans and noticed that all the heritage area plans look much more like strategic plans and don't have incredibly detailed specific projects, e.g., I'm going to build a visitor center in such and such town. It was really hard for them and their consultants to develop a good NEPA document in terms of it being related to environmental impacts.

I had experience working in NEPA and coordinated a work group. Worked with our environmental quality division and looked at a sampling of management plans and developed a new approach that was still in line with NPS guidelines but that essentially allows for a categorical exclusion from further NEPA analysis. A categorical exclusion is the most minimal NEPA pathway. Essentially, it's a form you fill out that indicates there are negligible environmental impacts. You go through a checklist and sign off on it so the regional environmental coordinator or park superintendent can sign off on it.

NEPA is triggered because heritage area management plans are approved by the Secretary. It's considered a federal action. But, when you look at environmental impacts as a result of projects in a plan, you're looking for environmental impacts and most of the heritage area plans don't identify projects or programs in any specific detail so you can't tell what the environmental impacts would be, proposed or otherwise. That doesn't mean that they are all going to be categorical exclusions. If we get a heritage area that does have specific plans that could result in environmental impacts, then perhaps they would have to develop an EA or and EIS (environmental impact statement). We all review their plans (so should know if an EA is triggered). If they identify in a plan that they are going to work with partners to build a trail eventually, that is not enough detail where you would actually know in any specificity where the trail is going to go. What we have decided several years ago after discussion is that heritage areas don't have to do an EA or EIS for NEPA they can be categorically excluded. We developed guidance that allows for that but based upon regional and national review of the plans to make that determination so it's up to us as federal employees to determine the pathway, not the heritage areas, because it's our responsibility ultimately. That being said, on the project level, when heritage areas receive funding through an NPS agreement, and our regional coordinators look at their work plan they are looking to see if there is any compliance that needs to occur. It could be National Historic Preservation Act 106 compliance. It could be National

Environmental Policy Act compliance. It could be other things too. We have other federal laws that heritage areas are responsible to follow. This does not preclude them from following federal law, it just allows for the most, in my mind, rational approach to the management plan that might not have environmental impacts, or very negligible impacts.

We decided to move forward with that process even before I published our guidance on it. As part of the work group, including all the regional coordinators and the chief of EQD and his second and third in command, we looked at these plans at the level of detail that the heritage areas are identifying proposed projects. I say proposed because it is all dependent on funding and partner support for these things. They don't own the land and rarely are they gonna be able to build the trail for the $300,000 that they are receiving from us annually. They are going to have to leverage other dollars. We got pretty much unanimous support for this. People wondered why we hadn't come to it sooner. There had just not been someone there to lead the process. The first trigger for NEPA, the first test is, is there federal involvement and there may not be federal funds or federal action. The action could be permitting. If they need permitting, then that could be another agency's NEPA process. Not necessarily ours.

Responsibilities of regional coordinators: Most of them administer the funds directly to the heritage areas and manage the cooperative agreements. Most of our regional coordinators also serve as agreements technical representatives and work with their agreements officers on managing the federal dollars. That involves a whole bunch of different processes that they go through. The other piece is providing more direct technical assistance. They do that in different ways that vary from region to region depending on how much funding they have available.

What we expect them (the regional coordinators) to do is a separate topic. There have been meetings and listings written down, but no final approved agreement shared out as program level policy. It is correct to say that we do not have a written policy of roles and responsibilities to heritage areas from the regional and Washington offices.

What we have done with our policy documents like the NEPA guidance has not been approved through a director. Same thing with the budget formula. We coordinated with the appropriate offices including solicitors and directors, but they didn't distribute them, it came from Martha. I am not sure what would need to be done to have a roles and responsibilities policy statement.

I don't know if it's absolutely needed. If it is then the minimum would be distributed by the Washington office and written out in some way that everybody could see what it is. We haven't had a conversation like that (responsibilities) during the time I was in the office (2010-2016). Another program is doing a similar thing as part of the strategic planning effort. They are looking at how they are going to provide their service and meet their mission with their Washington office and regional offices. That would make sense to me to do it in a coordinated effort. But we just haven't done that. There hasn't been clambering interest it that.

Organization for Sustainability: We have received, over the years, directives from Congress, either directing us to provide guidance or some kind of support to the heritage areas to develop sustainability plans. In some years they have referred to them as self-sustainability plans and in other years self-sufficiency plans. One of the things that I took on as part of our technical assistance role is to look at the issue of organizational sustainability and provide some sort of technical support, whether it be training or guidance or other things associated with self-sufficiency. In 2011 the heritage areas had identified topics that would relate somehow to self-sufficiency as a top priority for training. We developed a series of trainings for them with tool kits and guidance material around strategic planning, business planning and fund raising. That kind of spun off into another phase of the project where we worked with a consultant to develop a two-part survey of the heritage areas to capture their practices and what they were doing in relation to financial resiliency. Two, fifty question surveys went out to the heritage areas, their staff, and board. We took their findings report and their recommendations and are working on another phase to develop more targeted trainings specifically for heritage areas.

We are trying to fulfill the directives from Congress. Working with the heritage areas in different ways to better understand their practices. One thing that has been really successful that has come out from that is there used to be belief in the NPS that heritage areas weren't self-sustaining or weren't following best practices. But, I think, the survey really highlighted that overall the heritage areas are quite resilient and they are doing what they can, given their capacity and given the community they work in, to bring in other dollars, to find other ways to meet their mandate, and build a staff that can coordinate a heritage area.

We collect information from them annually about their practices. We ask what kind of planning documents they have in use and what they have been able to implement in those plans around organizational sustainability. It gives us a lot of good information to change the conversation that's been happening. That people automatically assume they are not self-sustaining. That has been a really great thing. I know that heritage areas, no matter whether they are experts at it or newer to the scene, all want to know how to fund raise more successfully, how to develop sustainable revenue streams, how to change organizationally, how to manage partners. It has been a good thing for the program, and I think it will go on indefinitely.

We pay for the trainers and the consultants and the heritage areas pay for their travel and attendance. We had consultants to work on the survey and the trainings. That's a big part of the technical assistance that we provide. It has been on a regional level to support capacity building.

Policy changes over time: NEPA guidance for heritage areas management plans which compliments NPS policy on NEPA. We have provided compatible guidance for feasibility studies that supplements the overall feasibility studies guidance that we have. We have the funding formula which provides our stance and approach to funding heritage areas.

The director put out a Policy Directive regarding the heritage areas which was well received by the areas and did a lot to help boost the relationship of the partnership. When I started here, I would say the relationship was strained. A number of the heritage areas had a real issue with the Washington office because of efforts to evaluate them which is a requirement. For whatever the reason it was done before, they felt like it was something being done to them with the assumption that they weren't doing things well instead of being open-minded and at least trying to coordinate with them. I think they thought they were the red-headed stepchild of the NPS and that was something that came up again and again in meetings. There was a lot of tension between heritage areas and the NPS especially with our office.

Things have really changed. There is a lot of good partnership feeling on both sides and I think it is in part because Director Jarvis is so supportive, and Associate Director Stephanie Toothman who is also supportive of the heritage areas. In the early days they were willing to attend meetings and talk about challenging issues around our budget and things that don't necessarily make sense to people working away from Washington. The policy memo is a small thing but it did so much to improve the awareness of the program by people working in the field and the director of the NPS supports this as an excellent partnership opportunity. As a way that we should be contributing to more of the grass roots community driven approach to conservation and economic development; where the NPS doesn't need to be the leader but can be a partner.

One of the things which we have tried to do is more outreach with the State Historic Preservation Offices and that is something I have done for the study processes. When the heritage areas develop their management plans, they are usually required by law to coordinate with the State Historic Preservation Office(s) and a lot of them are pretty close partners with these groups because they have a compatible mission. Not always the case but certainly in many cases.

Our office does not solicit new heritage areas.

We got together for a week-long workshop with all the program coordinators. Peggy O'Dell (NPS Deputy Director for Operations) came out to join us. It had been years since we thought about the country and themes that aren't well represented in heritage areas. I like the idea except for the amount of effort that has to go in to doing a study for it. Unless there is a strong set of groups that really want to see this (heritage area designation) it's not going to happen. It really is best if it comes from the people rather than us identifying needs. I, personally, see a real need for a Gold Rush National Heritage Area in the great state of California.

Challenges: It was really hard to go through a multiyear process to get to that funding formula and go through all that analysis and outreach and work and have Congress turn around and say, we're directing the NPS not to implement the new funding formula. I just don't think there is an appetite among some leaders who have well-funded heritage areas in their district to see a reduction. While we knew that could happen, I had to say to myself, why did we spend so much time on this if it's ultimately up to Congress. I found that personally challenging because I invested a lot of my work time. To see how it plays out year after year where we had at a meeting (Alliance of Heritage Areas meeting 2016) a full-blown fight break- out. We were not there but heard about it second hand. Once again, it is a group of heritage area managers that are well funded, lobbying against the funding formula and not being totally honest about it. Whoops, it happened to come out at a meeting. It's not good for morale and it's not good for a partnership program in which we are trying to have the heritage areas work together as partners themselves in this whole endeavor. I feel like that has been pretty challenging for me.

Heritage areas support of NPS mission: In so many ways. Each authorizing legislation mandates they be complementary in many ways. They are directed to work in partnership at the local level with all kinds of stakeholders to identify ways to preserve nationally important places, to offer educational programs where needed, to pursue compatible development opportunities, to provide ways for communities to recreate in these places, and to conserve resources that are threatened or could use a little bit of help. Very compatible with our mission.

I have seen a lot of great success where there is a park unit in the boundary of the heritage area because it facilitates the park to work beyond its boundary and both to work in close partnership with each other on projects and programs.

Evaluations: The evaluators look at three broad kinds of questions. What was the outcome of the work of the heritage area over the last ten-fifteen years? What was the impact of the federal investment, looking at their ability to match and leverage dollars? Is the heritage area sustainable, focusing on the heritage area coordinating entity?

I think by and large the heritage areas are pretty happy with the evaluations. Having somebody come in and look at things in a new way sheds light onto some of their practices and how they might firm things up or do things differently. It can give them a sense of what the partners might think of the heritage area and the outcomes of their work. Clearly, they get kind of nervous when it kicks off because they are being evaluated and the evaluations are then meant to be used by the NPS to make a recommendation to Congress on future funding and technical assistance. There may be some anxiety there but the methodology that has been developed does not judge them against their peers. It is a case study approach that takes into account outside circumstances that maybe prevented them from doing things.

I get the sense that the heritage areas see the value in the process. I feel like the evaluators and the evaluation questions, because they are so broad, lead to very broad answers. I also think our hands have been tied because the evaluators aren't able to do any in-depth interviewing of the public, not many people beyond the key partners the heritage areas have identified. I found their analysis to be broad brush and not deep enough to look at things like, is the heritage area coordinating entity sustainable. They just take the interviewees word and do their analysis. I wish the methodology could be revisited with more in depth on the sustainability piece.

It is hard because the heritage areas do a lot of different things. You really could evaluate any one of their projects in depth. But, I, in general, think that the reports are pretty broad, and I don't think they really get to asking some pretty tough questions.

They are not able to interview more people in part because of the Paperwork Reduction Act. In order to have a survey instrument for which you would go out and interview the public or many persons on a topic you have to go through the Paperwork Reduction Act process to create a questionnaire or survey document. It's never been done. Then we get some pretty basic information from the evaluations.

Future of NPS heritage area initiative: I think the future will be pretty much the same as it has been for a while. I don't imagine that there will be a new bunch of heritage areas designated in the near future. I don't imagine that our budget is going to go up tremendously. I have no idea what Congress will say about the funding formula.

I do think there are a lot of opportunities in the program. Tons of things that could be done, improved upon, and policies and guidance. Maybe there is an opportunity to think about some other designation process that would be for folks who just want to use the program format of partnership having a landscape scale approach to doing the work in a different way. Like the water trails. They have National Recreational Trails, designated Water Trails, designated National Trails. The National Trails designation is like the ultimate trail designation. But you could also be a Water Trail and use a different approach. No funding but you get recognition.

This job is like many jobs. You don't get a handbook on what you need to do, or how things work, or the history. History behind how we have come to work. The nice thing about a new person starting is that they are going to have a fresh set of ideas. Maybe not be encumbered by the history and why things haven't worked. I think there is value in that.

There are a lot of nitty-gritty projects that would be good to go forward. We have made a lot of progress on having annual performance reports that the heritage areas send in to us. Things like a proper data base that could track and manage the information from the reports. There is a need in this program for putting into place a lot of the foundations that programs need to function.

When I started, we were directed to do evaluations. We didn't have an evaluation methodology. People didn't know too much about our feasibility study or how to do that. There wasn't a lot of thought in the early days about all of the guidance and assistance that was needed to manage a program like this. What was hard was to get here and realize that none of it exists. It was a great creative time of trying to develop it, and also to think about how some of it could be refined.

There were times before Martha was here that there was only one person. That is kind of hard for one person to run a program.