

**National Park Service (NPS) History Collection**

---

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



**Keith Dunbar**  
**August 2, 2016**

Interview conducted by Antionette Condo  
Transcribed by Antoinette Condo  
Reviewed by Keith Dunbar  
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

Keith Dunbar  
August 2, 2016

Interview conducted and transcribed by  
Antoinette J. Condo

This transcript was reviewed by Keith Dunbar

**Keith Dunbar Interview: August 2, 2016**

The topic of National Heritage Areas is of keen interest to me because I have always loved history. It was my favorite subject throughout high school, and it was my undergraduate major at Simpson College in Iowa. Being involved in the establishment and development of the *America's Industrial Heritage Project* in southwestern Pennsylvania during the mid to late 1980's, allowed me to combine my love of history with my profession, which is an urban and regional planner.

Working in heritage areas is so different than a traditional national park unit because they involve an appreciation of the heritage of a region that goes beyond just an individual site. Heritage areas tell the story of people and places that center on regional themes and are often more comprehensive than an individual NPS unit in that they often involve a multi-generational legacy that endures in the landscape and the people that inhabit it. Heritage areas often involve multiple sites that have national importance. That was the case in Southwestern Pennsylvania.

Before we go further, a little personal background might be in order to put things in context. In 1977, I received my Master Degree in Urban and Regional Planning and Community Development from the University of Colorado. Shortly after that, following an internship and work with the State of Colorado, I was hired as a Community Planner in the fall of 1978 by the National Park Service to be part of the Denver Service Center's New Areas Studies Branch.

The branch was established by the NPS in the late 1970's to study areas and sites across the Nation that have been selected by Congress for study, and to evaluate these areas for their worthiness as potential additions to the National Park System. In some instances, study recommendations were ratified by Congress from a list of sites or areas recommended by the Secretary of the Interior. The General Authorities Act gives specific guidance on the conduct of Alternatives and Reconnaissance Studies. The law requires that the Secretary of the Interior submit studies to Congress, no less than twelve a year, of areas that the NPS has examined through established criteria for their potential to be added to the National Park System. The criteria include looking to the significance of site resources, the suitability and feasibility of the area becoming an NPS unit, along with examining alternative methods of protection that might be considered in addition to direct NPS management of an area as part of the National Park System. If Congress doesn't act on a study that has been submitted to them, the Department of the Interior can resubmit that study in subsequent years in fulfillment of the Act.

This grounding in the New Areas Studies program spurred my interest later on in the growing popularity of national heritage area designations where nationally significant resources are present in a given area, but where more traditional NPS management is not appropriate for one reason or another, such as the extent of the mixed pattern of public and private ownership.

My first New Area Study experience was in the Columbia River Gorge starting in 1978, culminating in the 1980 study report to Congress that recommended the area be designated as a National Scenic Area.

After the abolishment of the DSC New Areas Studies Unit by former NPS Director Bill Whalen in 1981, professionals from our unit largely went into the geographic teams that had been set up at the Denver Service Center to serve the various NPS regions across the nation. For the next several years, I served as a staff planner and project manager-team captain on both the Eastern team and Central teams at DSC. In addition to traditional General Management Plans for parks, my work also included boundary studies, land protection plans, and various other planning assignments.

Even though the New Area Studies Unit at DSC was abolished in 1981, the annual submittal requirement to provide a minimum of twelve studies a year to Congress for their consideration was still on the books. To this day, Congress continues to have an interest in evaluating and designating new NPS units. The studies involve working through an approved template of what needs to be surveyed and evaluated in the report. In those days, as is still the case today, DSC was often called upon to assist WASO and the various NPS regions in the preparation of New Area Alternative Studies and Reconnaissance Surveys.

Starting in about 1976-77, the then Mid- Atlantic Region, headquartered out of Philadelphia, called upon DSC to assist them in the production of the "Reconnaissance Survey of Pennsylvania Roads and Sites." I had the opportunity to be part of a four-member team out of DSC headed by project manager Landscape Architect Rich Giamberdine. The study team also included Ron Johnson who was our PhD Historian. The study was conducted in full coordination with both the NPS WASO office and the Philadelphia Office of the Mid-Atlantic Region. Locally, our key point of contact and person of leadership for the study was Superintendent Randy Cooley. Randy was the Superintendent of the Allegheny Portage Railroad National Historic Site in Cresson PA, and the Johnstown Flood National Memorial in nearby South Fork, PA above the City of Johnstown.

At the time, Congressman John (Jack) Murtha, whose congressional district included the Johnstown area of Pennsylvania, was a key member of the House Interior Appropriations Committee. He was a long-standing member of Congress, who would become the Interior Committee's ranking member, and also for a time was chair of the House Defense Appropriations committee when the Democratic Party held the majority in the U.S. House of Representatives. Congressman Murtha observed then committee chair Jamie L. Whitten and what he had done on the Natchez Trace Parkway in first getting a Natchez Trace study produced, and then getting the parkway established and funded as a unit of the National Park System. He (Murtha) thought there was a similar potential for a parkway to be developed in linking Altoona, PA and Johnstown, PA across the Allegheny summit. He wanted the NPS to look at that and convinced his colleagues on the House Committee to request that a study be done and succeeded in securing its listing and funding for the study. After appropriations were provided by Congress, the study was then scoped and staffed by the NPS using DSC as the study production office, with the study leadership and coordination role assigned by the Regional Office to Superintendent Randy Cooley.

It's important to note that the results of a Reconnaissance Survey can either be a recommendation for a full study of alternatives or other course of action. The study team findings in the "Reconnaissance Survey for Pennsylvania Roads and Sites," were provided in a briefing for the

Mid-Atlantic Regional Director, James (Jim) Coleman and his staff in Philadelphia, and the study findings were subsequently approved by WASO for submittal to Congress.

When the NPS study team report was finalized and was being transmitted to Congress, Superintendent Randy Cooley, DSC Team Captain Rich Giamberdine and regional officials briefed Congressman Murtha on the report. What was communicated in the report was that the NPS didn't think that it was appropriate to build a parkway in the region, but that the NPS found something else. What the study found is that there was a significant amount of important industrial heritage themes located in the study region. We recommended in the report that there was national importance of the region's contribution to the industrial heritage and growth and development of our nation during the industrial revolution. The report went on to underscore three central industrial heritage themes represented by the region; coal, iron and steel and transportation.

Armed with that information from the report, Congressman Murtha then introduced legislation and a law was passed to establish the American Industrial Heritage Project, a congressionally authorized Heritage Area, with an appointed Southwestern Pennsylvania Heritage Commission to guide its development. Later this designated Heritage Area would be called the Path of Progress.

The federal commission was made up of predominately local representatives from a nine-county region in Southwestern Pennsylvania, along with some state leaders. The commission was established under the Federal Advisory Commission Act, and subject to its reporting requirements. Commission members were nominated by local and state government and appointed by the Secretary of the Interior. The first elected chair of the Southwestern PA Heritage Commission was Richard Mayer, who was the owner and chief editor of the Johnstown Tribune Democrat Newspaper, as well as the owner of the local NBC Television affiliate in Johnstown, PA.

**Work in the Southwest Pennsylvania Industrial Heritage Area:** Following the success of the study report to Congress, and the passage of legislation establishing the federal commission to oversee the America's Industrial Heritage Project Heritage Area, there was a call out for a planner to move to PA to assist Superintendent Cooley in helping to staff the commission.

A similar situation was present in Salem, Massachusetts where a planner was needed to assist in that location following federal designation as a national heritage area. At this point, a close colleague of mine at DSC, Mike Spratt, was successfully recruited to relocate and be the lead planner on that heritage project.

With a similar opportunity present in Pennsylvania, I successfully applied for the position of planning director for the project and moved my family to central Pennsylvania, Hollidaysburg-Altoona area. Once there, I worked in tandem with Superintendent Randy Cooley at the Southwestern Pennsylvania Heritage Commission. Our first headquarters site for staff was at the historic Lemon House, located at the Allegheny Portage Railroad National Historic Site. The Heritage Area headquarters was later moved to a leased office space in Hollidaysburg, PA.

In this position, I was a full-time director of planning for the Southwestern Pennsylvania Industrial Heritage Area. At the time, Randy Cooley was the superintendent of Allegheny Portage Railroad National Heritage Site and the Johnstown Flood National Memorial and had a collateral duty as executive director for the heritage area. It was soon clear that Randy was doing two full time jobs, serving in the superintendent capacity, and also being the staff director of the federal commission for the nine-county area. The NPS regional office decided to promote Randy as full-time executive director of the heritage area, and to hire a new superintendent, Pete Nigh, to manage Allegheny Portage NHS and the Johnstown Flood NM. There were additional NPS employees hired to support the work of the Heritage Area and the commission, including a staff secretary and NPS Cultural Resources specialist, Loretta Schmidt. Later, seasoned professionals with local experience such as Carl King (former Altoona City Councilman), John Bennett (Heritage Tourism from Bedford County) and John Kazmier (local bank executive and community coordinator) were hired to bring additional staff capacity and local expertise. NPS Landscape Architect Joe Winston also provided important assistance to the project at that time.

We relied heavily on interactions with state and local governments who also provided in kind staff support. Brent Glass, the PA State Historic Preservation Officer (SHPO) and his very capable deputy SHPO, Brenda Barrett, were of great help to our efforts. After the completion of numerous site inventories by the Historic American Building Survey (HABS) and Historic American Engineering Record (HAER), the PA SHPO's office followed up with National Register nominations where appropriate. For a time, the PA SHPO opened up a Johnstown based office during this period to help with the large workload. The work of the HABS and HAER teams, coupled with full format photography from noted photographers Jack Boucher and Jet Lowe, captured for posterity critical evidence of important historical resources. This written and photographic record is now at the Library of Congress.

At the State level, our staff, supported by the commission, realized the potential importance of the State of Pennsylvania providing a complementary State Heritage Park system to go along with federal, NPS and local partner sites within the nine-county region, and elsewhere in the State. During the late 1980's and early 1990's, the State of Pennsylvania created its own statewide heritage park system. Just before it was established, commission staff, local tourism and historic preservation professionals, PA State officials, and State Senators and Representatives from the local area traveled together on a bus to other nearby states in the region to see what they had done with their heritage resources, both from an historic preservation and tourism perspective. We looked at sites in Massachusetts and New York that were part of their respective state heritage park programs.

During this time, Randy Cooley and others were cultivating a good relationship with the PA Department of Community Affairs, which was ultimately given the responsibility over the PA State Heritage Park program. The Pennsylvania State Legislature approved the establishment of a statewide system of heritage areas, including three heritage park units within the original nine county region of the federal commission (Allegheny Ridge, Lincoln Highway-Route 30, and the National Road).

I worked with the commission and Randy Cooley and his staff for about five years from 1987-1991. One of the most important things we did as a legacy for the region was that we helped to

protect and commemorate numerous industrial heritage sites. A couple of the sites were so significant that they were nominated and approved for National Historic Landmark status. These sites included the Cambrian Ironworks NHL in Johnstown, and the East Broad Top Railroad NHL in Huntingdon County. PhD Historian Sharon Brown from DSC provided invaluable assistance to us in doing the National Historic Landmark Studies (NHL) which were supported by the PA SHPO and approved by the Department of the Interior National Park Advisory Committee for listing. In addition, there were several properties on the National Register of Historic Places in our region that had national significance and directly contributed to the industrial heritage of the region such as the Horseshoe Curve and the Chief Mechanics Building at the Altoona Locomotive works. In these places, project funds not only provided for their preservation, but greatly enhanced the visitor experience through visitor interpretive facilities. We were able to document the significance of other sites and obtain preservation money for them from Congress.

Three of the four national park units within the nine county Southwest Pennsylvania region directly related to the themes of the heritage area. This included the Allegheny Portage Railroad NHS, the Johnstown Flood National Monument and Friendship Hill NHS. We were able to secure money from Congress to support the heritage area along with enhancements to all four NPS units within the nine-county region. The enhancements to these NPS units continue to be a legacy of the project funding that were allocated during that time. Enhancements included the preservation of site resources and structures, and the visitor experience by developing new interpretive facilities and media. DSC provided some very key support during this period in the design and construction supervision at each of the four NPS units. Architects such as Bob Lopinsky and Al Thornton made important contributions both at these units, and also at the Horseshoe Curve National Historic Site, which is locally managed. Skillful interpretive media firms such as Daniel Quan from San Francisco were brought in to enhance media.

Coinciding with this whole effort during the late 1980's and an earlier stimulus for the entire effort was the commemoration of the centennial of the disastrous 1889 Johnstown flood. Working with key local partners such as Richard Burkert of the Johnstown Flood Museum, the 1989 Centennial event was a big success, and included the full renovation of the historic Carnegie Library in Johnstown as the Flood Museum, along with the funding support for a new documentary film by Charles Guggenheim which won the Academy Award in 1989 for best documentary film. During that time, we also looked at the industrial history of the Johnstown area iron and steel industry and completed the National Historical Landmark study for the Cambria Ironworks; one of the most important early settings for the centralization of industry in the United States. The successes at Cambria Iron were later replicated along the Monongahela River in Pittsburgh by Andrew Carnegie as part of U.S. Steel.

At the Johnstown Flood Memorial, which is located at the site where the South Fork dam broke, there were cottages of South Fork Fishing and Hunting Club which listed among its members many of the significant industrialists of the time, such as Andrew Carnegie, Andrew Mellon, and Henry Clay Frick. Preservation funds were put into preserving their clubhouse and cottages. A new visitor center and dramatic new film was produced by the NPS Harpers Ferry Center (Tim Radford producer) for the site, as well, in time for the centennial. Among the many events, the NBC Today show featured the site during the centennial year commemoration.

These are just some of the examples of what was accomplished across the nine-county area.

We had themes of coal, iron and steel, railroads and other transportation. Examples of these resources in the region are the Pennsylvania Railroad Locomotive and Car shops in the Altoona and Hollidaysburg area, the Pennsylvania Main Line Canal which linked Philadelphia with Pittsburgh, and preserved features of the National Road, America's first public road, that Albert Gallatin, who was Thomas Jefferson's Secretary of the Treasury, helped to fund and develop. Industrial themes that the heritage area represented addressed the centralization of industry from rural iron plantations to large scale steel mills, and the transition from wood fired to coal fired manufacturing and more powerful locomotive engines. The region's production of iron rails, barbed wire and other products helped to build the American West in the mid to late 1800's. Industrial technological advances helped to conquer the Allegheny Mountain barrier first with the Portage Railroad, and then with locomotive technologies and the engineering accomplishment of the construction of the Horseshoe Curve by the Pennsylvania Railroad. Advances in metallurgical technologies and the centralization of industry propelled Cambria Iron into the forefront of the iron and steel production in the late 1880's.

It's important to note that we made sure that most of the funding for the projects went to nationally significant sites, including National Historic Landmark Sites, existing NPS units, or National Register properties. Besides Randy Cooley and myself and other staff people as mentioned, the project liberally engaged professionals from the regional office in Philadelphia; including cultural resources, rivers and trails planners and others, along with planning, design and construction supervision from the Denver Service Center. We extensively utilized the professional skills of the WASO based HABS and HAER teams out of Washington who oversaw teams of graduate students in the conduct of inventories and studies at various historic neighborhoods and industrial sites throughout the nine-county region.

In addition to these efforts, the project work included promoting rail to trail conversions that linked historic communities. A lot of that heritage is out there on the ground today including the trail that goes all the way from Pittsburgh, PA to Cumberland, MD (the Great Allegheny Passage) and connects to the C&O Canal towpath all the way to Washington DC. Thanks to people like Paul Labovitz who was then located in the NPS Mid-Atlantic Office (he's now Superintendent at Indiana Dunes National Park), this became an important lasting legacy of the heritage projects. These rail to trail conversions allow history to rub off on the bikers and hikers as they pass through these historic towns and industrial sites as they recreate. Another regional example is the development of the Lower trail which runs for 17 miles on a previous Pennsylvania rail branch line, part of the trail goes along the former Pennsylvania Mainline Canal towpath and passes historic canal locks and an old iron furnace and related iron plantation workers housing and ironmasters residence that received some project funding support.

**Funding of the projects:** Over \$90 million of federal appropriations and upwards of \$50 million in state heritage money was received over several years and put into a combination of NPS units, sites in NPS programs, preservation, new construction and rehabilitation of buildings and trails. Additionally, surveys and photographically documented materials provided an historic record of the region's heritage, and are permanently protected in the Library of Congress,



Pennsylvania State Archives, and an industrial heritage library at the Indiana University of Pennsylvania in Indiana, PA.

There were always questions about whether the money was being well spent in our time with the Heritage Project. What is the public investment in these sites all about? But I think we successfully answered that by making sure we documented everything. In fact, Congress was always supportive, and bipartisan. While Congressman Murtha, a Democrat, was the key person behind all of this, Congressman Bud Shuster, a Republican who represented the greater Altoona area was also very supportive. We had other congressmen as well from the region who were supportive of what we were doing. With that support we wanted to make sure that the money was well spent. Congressman Murtha, I would say, was very patient with us because he said we need to do this right. If we were going to be investing public money in these industrial sites, we have to make sure they are worthy of the expenditure. That they are truly of national import, of national significance. That is why we did the inventories first and articulated what projects and sites were the most worthy of preservation and development.

To address the issue concerning some of the negative press that occurred later about the development and use of public resources in the nine county regional heritage area: to me that issue is twofold, and should be viewed in the spirit of constructive criticism, and lessons learned, that other heritage areas in the future can learn from and apply to their own operational needs.

First, it's important not to spread oneself too thin. Geographically, a project covering nine counties is a large region to address, and the demands on heritage area staff attention and time is constant. The importance is to encourage others in the heritage area to follow your lead but do for themselves. Often many sites and landscapes are more of state or local importance, but their preservation is still important and should be encouraged but are not likely appropriate for the expenditure of federal funds beyond technical assistance. Keep one's eye on the prize and focus on the nationally significant venues and spend much of your time and limited financial resources on embellishing them for posterity.

Second, spend an equal amount of time on the sustained maintenance, preservation and ongoing management of sites. People are excited about ideas and turning ideas into project development and reality. The creative and development part of a project inspires and garners attention and is advantageous economically and politically. However, it's another thing to be vigilant and supportive for the ongoing maintenance and competent site management that is required to sustain sites and safeguard the investment of public funds that have supported heritage development projects.

Some of the projects we funded in the region have subsequently converted to some unintended uses at the local level. An example would be the historic post office and public utilities building in Windber, PA built by the Berwind-White Coal Company. This venue later changed from a public interpretive site to a private business use. While the renovation of the historic Arcadia Theater has been a community success, some of the other articulated visions for the Windber-Scalp Level communities as a prime example of the role that coal mining played in the development of the region have not been realized. This included the planned preservation of key structures and features of the nearby Mine 40 in Scalp Level. Also planned, but never

implemented, was the preservation of one of the traditional worker houses to more fully preserve and interpret the coal mining history of the area, similar to how the Wagner-Ritter House in a Johnstown neighborhood next to the historic Cambria Iron Works tells the stories of the lives of typical workers in the iron and steel industry during the period. Still other nationally significant sites still await preservation and attention. This includes the East Broad Top Railroad National Historic Landmark, which to this day still merits public funding for its preservation and interpretation for the public good. Unrealized visions and lost opportunities can be frustrating.

I would say in retrospect some 25-30 years later that our project was a measured success, with some accomplishments standing the test of time, others in need of new life, and others yet unfulfilled. Overall however, there is a lasting legacy on the landscape of Southwestern Pennsylvania.

**Oversight:** Regarding the question of scrutiny of the work that we did, newspapers like the Johnstown Tribune Democrat and the Altoona Mirror, local daily newspapers in the region, would closely follow our projects and the workings of the federal commission. Additionally, there was also a lot of television coverage from Johnstown and Altoona. The media was very interested and always asked a lot of questions about what we were doing. I'll have to say that any media coverage passed scrutiny or passed the test of what was right to do. We always had in mind the public trust. We always treated every dollar we received as the last dollar we would ever get. We were federal employees and very cognizant of all the laws and policies that we should be following.

Our federal commission met on a regular basis for us to give our reports, and when you have this amount of money, upwards of \$8, \$10, \$12, or even \$13 million dollars a year, there are people on the commission or from local communities who said, "well, why aren't you spending some of that money on us?" Executive Director Randy Cooley and his staff, along with the federal commission, weren't deciding what was a worthy project unilaterally. We assembled what we wanted to do, based on sound priorities and project planning, and got the proposed budget together for the consideration, discussion and approval by the commission for the funds which had been allocated by Congress to the heritage area for that fiscal year. But its human nature that there are always going to be people who want their own favored project funded and are disappointed when it doesn't happen. It should be underscored that all the commission meetings were open to the public. All the meetings had media coverage and scrutiny. Everything we did was open and transparent. In terms of reporting and oversight, the commission reported to Washington, and the Federal Advisory Act was followed.

Southwestern Pennsylvania was toward the end of its decline in the traditional iron and steel, coal and railroad industries. Tens of thousands of jobs in these industries, that had been there during the latter part of the 19<sup>th</sup> century and through much of the 20<sup>th</sup> century, were now gone due to various economic forces in the region, nation and broader world markets. The nearby Pittsburgh metropolitan area located just to the west, was able to rejuvenate. At one time the Pittsburgh area had over 150,000 people working in steel related industries. They successfully transitioned into a major health care center, educational center, and biotechnology research center, to augment what remains of their historic founding industries such as steel and aluminum processing. Our area was trying to do the same thing. They were trying to transition into new

industries and new employment opportunities. As one lives in an area and experiences the closing of mines and mills, and lots of people lose good paying union jobs, there are those who question spending public funds on preservation with the goal and hope to not only preserve sites important to the history of the area, but to attract tourism to the region and to help in economic diversification. Some raise the question, “Is this money really well spent? Where is it going to be spent, and how is it going to benefit our community?” That to me is the root of how there can be some controversy in the funding and development of heritage area resources.

**Support from the Denver Service Center:** Regarding support from DSC, I have already mentioned all the support we got along with other offices within the NPS, the State of Pennsylvania and the people from the local communities. Professionals at the Denver Service Center provided key support, including a large team led by Landscape Architect Fred Babb, and people like historian Harlan Unrau, Sharon Brown, Mike Bureman, Ron Johnson, and so many others who contributed in planning, landscape architecture design and building architecture. Architects like Bob Lopenski and Al Thornton contributed outstanding design skills for places like the Allegheny Portage Railroad NHS enhancements and the development of the Horseshoe Curve NHL interpretive facilities. Sharon Brown was a PhD historian from DSC who did a lot of our studies for the ultimate designation of National Historic Landmark status for the Cambria Ironworks and East Broadtop Railroad.

**1989 Denver Service Center planners meeting:** The reason that heritage areas are popular and remain popular is that they don’t involve any federal land acquisition. You have the opportunity to commemorate a significant chapter in American history using a collaborative approach to resource preservation and development. A heritage area is a landscape or a themed cultural region that involves private and public partners at all levels of government, but it usually doesn’t involve federal land acquisition and yet may provide the opportunity or promise of some federal funding to support heritage development. That can be attractive to congressional members.

The importance in the development of heritage areas throughout the Nation is for the NPS to provide an objective evaluation of whether an area merits to be considered for heritage development and worthy of the expenditure of public funds. That’s where I think we were at that meeting in Denver in 1989, to discuss the criteria needed to determine the national significance related to the establishment and development of national heritage areas, and how best to undertake the various studies we would be asked to do for prospective areas. This could involve a quick evaluation of an area’s potential or worthiness for future consideration, or a full-blown study with recommendations and alternatives. Most importantly, since the success of heritage areas is contingent upon public-private partnerships at the local level, the capabilities and commitment of local residents and local officials is critical to the future success of a heritage area, even when the litmus test of the significance of resources has been met.

Areas around the country were saying, “How do we get one of these in our area? We feel we have areas that are significant. How can we get this thing going?” Part of that meeting was to respond to the prospect of seeing the demand for a whole lot more of these requests, and how the NPS was going to get a handle on this and how we were going to respond. As I recall, part of the discussion was centered on how the NPS can develop a process where we evaluate these potential new heritage areas objectively, and not just have a congressman come up with the idea

to designate a heritage area and proceed with federal funding and staff support. Discussion centered on how to institute a process where Congress agrees to study an area first to see if it meets established criteria, and only then could it be considered for designation and inclusion in some sort of National Heritage Area system. We need to defend the process, and make sure we study a prospective area first. We've got to tell Congress, don't designate right away; give us the funds to study it first. If it doesn't merit further consideration, the NPS should take responsibility for that determination and politically pressured officials could then point to the study results and recommendations as they weigh options for the future.

There were several areas that DSC and the regions looked at as a prospective area and would conclude "No, this doesn't merit national designation because it doesn't have the national importance or resources. However, that doesn't mean it's not important to the region, or the local area, or even the state for that matter. You may want to consider this as a state heritage area or a local effort to create a museum or historic site, or to protect a valued landscape."

We were trying first to delineate a process to evaluate these areas, and second, in addition to resource significance, to examine the local capabilities and human resources available to support a heritage area designation where an action might be warranted. Does this merit future study as a national heritage area or other national designation, or is a matter that is more appropriate for action at the state or local level? That was and is a very key determination as part of the heritage area study process.

We always felt that national heritage areas were another branch on the NPS tree, whether based on their well-articulated cultural resource importance, natural, scenic and landscape values or a combination of all of the above. We felt that national heritage areas, even if they wouldn't be units of the national park system, should be a separate branch on the national park system tree and have its own criteria, and its own method of management, reporting requirements and oversight, triggers for NPS technical assistance. Also important was to put in place clearly articulated procedures for any federal funding support that might be provided to the area at the outset of designation, and continuing into area planning, development and operations. The key here is for the NPS to manage expectations and not to either over promise or under deliver.

We felt that generally heritage areas were areas that met a test for national significance, were worthy of designation and support, but were not directly managed by NPS, and had proven local capabilities and a commitment to partnerships that would provide the foundation for policy direction and political and financial support to the area. We felt that the designation of National Heritage Areas should be supported by Congress, the NPS and the Department. Since they are evaluated and established differently, they should be organized and scrutinized differently. And, most importantly, they should not take away from the day to day operational support that we give to our traditional NPS units.

**Policy changes:** Southwestern Pennsylvania was originally not on the official list of heritage areas. It was funded separately. I think it should be on the list. There are enough of the projects for which we provided funding that have lasting legacy improvements on the landscape. These resources should be a part of a formal designated National Heritage Area.

I do understand that the goal for any heritage area is that first you give the area an infusion of federal money and that starts tapering off over time and then at some point they are to be, *on their own*. This is somewhat akin to the formula used for the Main Street program to stimulate the preservation and redevelopment of historic downtown areas, only with a longer time line. I can see the merit of once these areas are officially established, why would they not exist anymore as a part of a national system? Just because the federal funding support draws down to a large extent, why wouldn't they continue to have some modest level of support even if it's only technical assistance from the NPS or some tie to some possible matching historic preservation or other funding. There is still a need for a national heritage area system. It still needs to be part of the NPS tree along with our traditional units and NPS programs such as the National Register and Historic Landmark programs, Rivers and Trails Conservation Assistance and other NPS programs rooted in federal law.

The National Heritage Area program needs to have some Washington oversight and management, along with technical assistance that I urge largely comes from the regional offices. Any new areas should follow the established criteria and that first step of evaluation, assessment prior to possible designation, then on to planning and growing capabilities once and if designated.

Even though the Southwestern Pennsylvania Heritage Preservation Commission sunsetted as a federal commission, hopefully at some point in the future, there will be efforts to reestablish the commission and make the area formally part of the National Heritage Area system. There has been too much public investment in area resources to let them wither on the vine. Given the fact that many of these historic resources and landscapes share some common cultural themes, they should be viewed more holistically in the context of a national heritage area, than just separate disjointed resources. You want these sites to flourish, be visited by the public, and protected for future generations. There has been an investment of significant tax dollars, and all the work that went into them in the early years of their development needs to be sustained. If that sustaining energy is at the state and local level so be it. It doesn't matter where it comes from, but the NPS ought to be standing by in the technical support capacity to continue support even after the commission may have sunset.

Heritage areas need a separate line item funding in the federal budget. They should not have ever shrinking funding that heritage areas fight over each year. There needs to be a commitment to the concept by DOI, the NPS and Congress to have sustained funding for National Heritage Areas, and some increase in funding if new areas are added. This, of course, holds true for traditional NPS units as well.

In the increasing homogeneity of America where we sprawl out from our urban centers, and use a cookie cutter approach to land use patterns featuring sameness in national branded commercial business and housing stock, the establishment and sustaining of national heritage areas across the Nation are critically important if we as a people want to preserve key sites and distinct landscapes that have special defining characteristics and are worthy representatives of the mosaic of American life and culture. Often these are living landscapes where multiple generations have thrived in a distinguishable cultural landscape that defines their life experiences.

In summation, the success of heritage areas is the marriage of economic development and historic preservation. It takes grassroots support by people who are very proud of their local history, want to see it protected, commemorated and celebrated, and commit money and time to make sure that it happens. It doesn't matter if people grew up and toiled in company coal towns, experienced the daily noise and grit of a working steel mill community, lived the smoke and whistles coming from active rail yards, locomotive works and repair shops, farmed and worked the land, or carried on cultural traditions of food, music, art, language or celebration. It takes that historic preservation emphasis on places and landscapes, the experiences of the people who lived and continue to be part of the living landscape, along with the tourism and economic development community in each of these local areas to make heritage areas a success. In this vein, it should be underscored that the designation and development of national heritage areas and their related historic preservation efforts are not a panacea for all an area's ills and lost jobs and declines in local economies, but it can aid the goal of economic diversification.

The most important thing to remember is that heritage areas are as much for the people who live in the area as they are for people who come from far away to visit these areas. Heritage areas provide the opportunity for multiple generations to feel pride in what people who came before them accomplished. Out of this spirit can come hope, and confidence of a community or a region going forward with not only a respect and commemoration of the past, but an eye on the future.