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



Chris Abbett  
February 27, 2017

Interview conducted by Antionette Condo  
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508 compliant version by Jessica Lamb

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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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**Chris Abbett Interview: February 27, 2017**

Working with National Heritage Areas became a part of my job many years ago. I worked in the Rivers, Trails, and Conservation Assistance Program before the role I'm in now, so I was kind of around the fringes, the edges of it as its concept was developed and implemented through many congressional actions over the years. Then I stepped into a position as the Partnerships Division Chief for the Southeast Region and when I did that, heritage areas were one of the responsibilities of that division. Now it is part of the broader portfolio that I am responsible for. I wouldn't say I was disinterested in it, but it is not something I pursued per se.

In 2008, I tried to put actions in place to improve our relationship with the NHAs, because we were awful partners for the heritage areas in our region, as we have been nationally all along, and unluckily they have been pretty bad partners too at times. One of the things we tried to do instead of just being a partner out of the regional office was to identify local NPS units to collaborate and be a liaison with them. I started with the idea of trying to identify nearby park liaisons. In our twelve areas we have either a park superintendent or someone within the leadership team at a park being that liaison. Some playing much more a collaborative role than others but at least all of them do have someone in that role. The other piece I have tried to engage across just the partnerships realm, we set up a resource group made up of people like a representative from natural resources, cultural resources, and interpretation and education. Kind of all the different disciplines that had some role in heritage areas. That group does not still exist right now. The last few years have just been chaotic, so I have not resurrected that in the way we had it for about five years. It was fairly active.

Other divisions do know more about heritage areas now than those early stages. But typically, we just chime in on issues around that discipline now. I was dealing with a couple of emails from our regional office compliance staff because they are helping one of our heritage areas come up to compliance on issues with a federal highways project. I also had to deal with some emails with our interpretation staff on some of the things they are doing with heritage areas. We are still involved and engaged individually but we don't have meetings of that broader group anymore. Our regional offices do work with heritage areas as needed. We have had training with all of our NHAs, and a lot of those staffs came out and participated, like our financial assistance staff from contracting and our compliance staff from both cultural resources and from planning and compliance. Yes, they are still engaged, and they do definitely understand the heritage areas a lot more than we did when I stepped into my role almost ten years ago.

In a perfect world probably ten percent of my time is spent on NHAs. February (2017) was like *heritage areas month*. I was involved in heritage area issues/topics/meetings for more than a third of my work time that month. We had to go try to resolve some issues with the Gullah-Geechee (Cultural Heritage Corridor) Federal Commission. We had to do the same with one of our potentially sunseting areas, the South Carolina National Heritage Corridor. We had to do the heritage area training, and Muscle Shoals (National Heritage Area) went through a transition.

I don't expect the parks to play a significant role. I expect our heritage area program manager to play that role. They (the parks) are liaisons. They can help with events, and just being a partner,

but the vast majority of the staff with heritage areas, the work, is managing the money, managing agreements.

**Our Southeast Region administration of the heritage areas:** We were focused on training around administration because we developed a regional administrative procedures manual for the Southeast. I had staff work for two and half to three years to try to create such nationally, but it just didn't happen. We're no longer waiting on that. I can't control whether we do our job as an agency and develop national processes around the NHA Program, so we are at least trying to do things consistently on a regional basis. We can't control what happens outside of here. Because of multiple reasons we don't have the strong direction from Washington National Office to try and create consistent guidance (across all regions). So, every region functions as its own program. Plus, you are not just dealing with heritage area program managers in the region, you are also dealing with the federal financial assistance folks, which varies from region to region. So, two wholly different disciplines and both a little messed up from region to region. In our region it (procedures) varies from contracting officer to contracting officer as to what they expect. An hour would not be long enough to describe all the frustrations around that. Each region handles things like they believe it should be handled and every contracting officer, now called agreements officers, handle it differently. That is why I can't keep a heritage area coordinator because that side of the job is just onerous. That's the majority of the work.

**Roles and responsibilities of NPS regional and national coordinators to heritage areas:** I don't know for national, but my regional staff person would have to do everything around heritage areas. Their primary responsibility that takes tons of time is doing agreement modifications or a new cooperative agreement every year with all of our areas and we have twelve in our region. It's managing those dollars, making sure that the area is doing what they need to get their money, which is a budget and statement of work and all the paperwork associated with the funds. And then, throughout the year dealing with their questions about things like match, what's a legitimate match, what can they spend their monies on, can they do this, can they do that. That is the majority of the time spent by the NHA regional coordinator.

One person is all we are able to fund, and I can't hire one now because of the hiring freeze. We use technical assistance funds to do that. As I guess Midwest Region is also using technical assistance funds to fund their NHA program manager, and all the other regions excluding the Northeast Region. I suspect the Northeast Region will change too. We don't use any ONPS dollars to cover the salary and benefits of our heritage area coordinator. Nor will my regional director do that. We do include a significant portion of my time which is ONPS funded.

If we ever have any heritage area feasibility studies, they are involved in that. A big chore, we had three going at one time in the past. If the areas have not developed their management plan, we have to play a key role in helping with the management planning. There is also the whole side of technical assistance and guidance, that's the part that suffers. We don't get to do a whole lot in that arena like helping them with actual projects, helping to broker services like interpretation and education and helping them on particular elements that aren't money and administration related. That's the part that suffers because the person is so enmeshed in having to deal with the money management and agreement management.

**Criteria for successful national heritage area:** An actual heritage area itself needs good, solid management structure which a lot don't have. They need to have other sources of funds, not just in-kind services to be able to have other money besides federal money they can expend on activities they need to do. They need to have broad support within the communities that they are part of, and they have varying amounts of that. They need to have solid support from the NPS.

They have to have good management of the money which is one of the biggest issues is the folks often are unsophisticated about managing big amounts of money especially federal funds. Depending on the structure of their organization, like if they are a non-profit or a federal operating commission: they have to have good accountability processes in place like; conflict of interest statements, and processes where they follow the rules on how they provide money to grants to partners, how they administer those grants with partners. That's the part that is probably the most source of frustration with us dealing with them because they don't understand that they have to make their subcontractors, their partners who receive grants, follow the same kind of responsibilities that they have to with us.

I think as an agency our whole process around cooperative agreements that we provide out to a variety of partners through those is pretty sketchy. In the same kind of way that it is with these partners. A lot of them also have misunderstandings or don't follow through on the accountability responsibilities they have around agreements. As an agency we also do a pretty poor job because we pass that responsibility down to someone as an extra duty. We give that to someone called an agreements technical representative (ATRs) and our ATRs are not equipped to understand what they are supposed to do in terms of administering cooperative agreements with partners. It's a troubling world. We hand hundreds and hundreds of millions of dollars every year in federal financial assistance out to partners and those accountability issues are both with the partners and with the agency. To be a good solid local coordinating entity for a heritage area requires a whole lot of organizational skills and accountability responsibilities and we have a very mixed bag in terms of whether heritage areas are doing that and capable of doing that.

**Performance measures for heritage area success:** That is a hard one. I know Martha (Raymond) and WASO are playing pretty hard on this idea of sustainability, but I do think that is a really important piece for these heritage areas local coordinating committees because they have just got to have stability and sustainability. Also, stable relationships with their partners, their communities that they are part of. We don't have measures beyond financial performance that we track our heritage areas on. That is a key piece. They have to be accountable for the money that we are providing. Most of what we have is around that. Are they meeting their match legitimately? Are the things they consider matches really matches? Are they using the money for the things they say they are going to use it for? When they turn in a work plan, they are supposed to use the resources for those actual items. Are they expending the money? We have some areas that have this huge amount built up in funds that they have not accessed yet and they have like one year at the end of sunset where they can expend those funds. They only have a five-year period to expend them once they have been obligated. Those are the kinds of measures that we typically focus on.

In a perfect world we would love to be able to focus on the project side of things, but we can't keep our head above the water on the administration of the financial resources and their

accountability responsibilities. We can't even get into the other. We try our very best. We do a program review of one heritage area every year and we did not do that this year because of all the change-over in our staffing. We try to go in and look at how they are doing in implementing their management plan. That is not something we have been able to do more broadly, because, once again, we are barely able to handle the money side.

**NPS administration support for heritage areas:** My regional director has absolutely been a huge supporter of national heritage areas. Poorly nationally. We had an (NPS) director that every year talked about how wonderful heritage areas are and then in our (NPS) budget every year put them in for half of what they received the year before. That is poor leadership.

**Funding:** They each should see an equitable amount. You could have some other funds that could be competitive beyond that amount, but I don't believe that one area should receive \$800,000 and others should receive \$300,000 just because of when they were designated.

**Heritage area management entities:** I would say that the worst possible structure is a federal operating commission. I have been dealing with one of those for ten years and it's a terrible structure. I don't know a positive for it. I would never encourage a federal operating commission as a management structure. Non-profits certainly have positives because they have a lot of flexibility. They have the ability, if funding goes down, to cut staff fairly easily. Some of the negatives are they don't necessarily have a sustainable fund source unless they go out and raise it on their own. To me, non-profits are certainly better than federal operating commissions but there are some challenges around long-term sustainability for the non-profit.

In our region we have a couple of different models beyond that that have probably proved a little bit better. One's working within a university which offers a little more sustainable funding source with that university support, plus you have access to other professionals like administrative professionals to help manage the monies and help provide assistance through the heritage area on local projects. So, the universities have proven to be a fairly successful model for management in our region.

The other model we have, a couple are part of state agencies. From a standpoint of sustainable funding that's a great source because you have got an agency behind you. From a standpoint of integration into the community and helping really accomplish the work of the heritage area, I think they probably have been less successful. From an agency standpoint, things can be very positive or very negative. When those agencies are doing fairly well financially the heritage area does fairly well. If it is not doing well, then absolutely not. The heritage areas are a minor piece of all the state functions, so they get the very bottom end of the support scale. There can be some real frustrations where the state agency tries to funnel off the staff and/or the federal funds to do other things besides heritage area things. It has proven a little bit more challenging.

I think the university model and the non-profit model have probably been the more successful ones in our region. We have one that's a really unique option. It's a state authority, Augusta Canal. I'm a little less sure of how it functions within that framework, but the nice thing is, it kind of straddles the world between agency and non-profit management.

As a general rule, I'm a fan of smaller versus bigger (in terms of geographic area for a heritage area). I think Augusta is super functional, for a lot of reasons. It tells a very critical story, but they are able to manage that story because it is not such a scale that it's just impossible to be able to accomplish. Whereas the Gullah, parts of four states, that proves amazingly burdensome and has really kept them from being able to focus and get things done in lots of ways. I'm a believer in smaller and more focused.

**Sunsetting of heritage areas:** I believe they should sunset. I believe that is what Congress' intent was. I know that you'll hear from the Alliance (of Heritage Areas) and probably from Peter (Samuel) in Northeast Region that there never was an intent like that. But if there never was that intent, they shouldn't have put that in legislation, should they? I believe the intent of the NPS providing funds for heritage areas is only seed money and that we should help them get up and going but there is a time when those federal dollars need to go away. I believe that is what Congress' intent was, but Congress is awful at policing such things.

I believe, along with a whole lot of other partners, we (NPS) should be able to collaborate with them after they sunset. I don't believe that we should have a responsibility to provide dollars to them after that date. I am a believer that as an agency you ask for that national direction. I believe that we should set aside funds to do the responsibilities we have right now for them. I say we are using technical assistance monies to cover our coordinator. It should be ONPS funds from Washington to cover our responsibilities and every region does not have to have a heritage area coordinator. We could function as a national program instead of trying to make it so local. But as an agency we should provide ONPS dollars for staff to serve that role and then once they sunset then we should be able to provide technical assistance. But we don't have to administer the dollars at that point with them. We should be able to bring new ones into the system.

That has been one of the issues recently. Because of funding issues, it is a shame for some of the really great unique resources they could help preserve and interpret. We have some areas that have for darn near 30 years or more gotten federal dollars. I don't believe that was the intent nor should be our intent moving forward.

**Program legislation for heritage areas:** I am in favor of program legislation. I don't know if I am in favor of what is being put forward now. As an agency we could do a lot more programmatically than we say we can, without legislation. We could provide direction, guidance and policies. We shirk that responsibility and say it can't be done without program legislation.

**Advantage of NPS to heritage areas:** The money probably is what they are going to say. Being allied with the NPS is a positive thing if you are part of that family. We have a brand that is fairly well known and respected. Having some connection to the NPS from their vantage point should lead them to be able to access other funding sources than just us. In theory, they should be able to play off that relationship with the NPS. But I don't think we have been the kind of partner we should be with them, based on the expectations they have.

**Heritage area contribution to mission of the NPS:** It depends on what you see as the mission. I go with the expanded mission, the second paragraph where we are to be leaders in conservation and recreation beyond our parks. There is a place for them by the very nature that they are

congressionally designated and very different one from another. I don't know that we maximize the benefit they might provide. If we had a better relationship with them there is probably a lot, they can do to support our parks within their boundaries. Right now, I don't know the relationship of NPS, and heritage areas is of the scale that they do things enthusiastically to support our parks. They certainly are instruments. The concept of protecting and interpreting broader landscapes is a big thing the NPS can espouse and lead nationally. I don't know that they fit into the parameters of what the leadership of the agency views in terms of our roles and responsibilities. That has been kind of a tension all along from the very creation of the concept.

**Challenges:** We have invested so much time in the Gullah-Geechee Cultural Heritage Corridor. That one has been so dysfunctional from the very beginning from when it was created over ten years ago. We have poured resources in now for the third time, a quarter or more of someone's time for a year or more, to try to help them get some sustainable footing. I feel we finally have accomplished it this time primarily because we were able to help change out a lot of their federal commissioners. They had an awful group of commissioners and even worst leadership within those commissioners. They just accomplished very little. They brought in almost no dollars. All of their matches have been in-kind. That worked okay when they were getting \$150,000 a year but when they ratcheted up to \$300,000 it became really difficult for them to make those matches. I think we now have gotten them on a path where they have some really solid commissioners that are not belligerent to NPS, to the federal government, and to white communities along the corridor. This group is focused on raising dollars and something more important, accomplishing some of their management plan over the next four years before they hit the sunset date again. We had to invest a lot of time in helping them; exploring options of a non-profit side, helping them get new commissioners, helping them deal with some accountability issues and governance issues of their organization, helping them get ethics training over and over. We poured a lot into them. That's a role we should play as an agency for all of them. But we haven't had the staff resources to do that.

We've helped on a variety of different projects. We've helped with interpretive planning for a number of our heritage areas. My role has just been to try to get a handle on the whole money side versus providing substantive amounts of assistance on projects. That is what the staff would like to do. That is why I can't keep a heritage area coordinator. They come into the position thinking it is a real partnership position. They will get to collaborate with these really neat areas around the region on projects. They find out they have very little time to do that because they are so enmeshed in dealing with the money side.

There is a lot that could be done better in the way we structure our assistance to heritage areas nationally. I think that is where a lot of frustration has come too. In all honesty every single heritage area coordinator I've had over the last ten years, one of the big frustrations is dealing with the money side and federal financial assistance in our own agency. But the other side that's frustrated the heck out of them is dealing with Washington. Our lack of guidance and direction from Washington on how to administer these things and thus allowing each region to do as they will is very frustrating when your heritage areas come to you and say, why can't you do like Northeast Region or why can't you do like Midwest Region. We are very poorly organized and managed as a national program. We are not really a national program. We are six regional programs. And a lot are fairly dysfunctional. Every other (NPS) program is better organized.



I'm not saying they are organized well. I came out of the RTCA program and was very frustrated. I think they have allowed latitude with regions to do things as they choose. Under Bob (Ratcliffe) they have tried to change that a little bit. There is, though, a whole lot more guidance and direction. I would say that program looks a whole lot like itself from one region to another than the heritage areas program. In all honesty this is a grants program more than it is a technical assistance program. Until the agency understands that and until our WASO heritage area program leadership understand that it's going to be hard to make the institutional changes to be effective as an agency with our responsibilities and have our heritage areas be accountable for their responsibilities.

The technical assistance funds are distributed very poorly out of Washington. Northeast Region gets \$250,000 in technical assistance or whatever and our region gets \$150,000 or whatever and yet their region has been willing to pay for Peter's salary out of ONPS dollars. That means they have all that technical assistance money to provide technical assistance. I could live with the fact that they are funding staffing out of ONPS funds because then they have more money for technical assistance but just the fact that they get so much technical assistance monies versus us and other regions I don't think that is the right way to distribute those dollars. Then, we give certain regions that have one heritage area receiving a third of what we receive in technical assistance dollars, that's just ludicrous. Administration of these things is complex, and we really need a cadre of staff nationally that can be the money agreement manager types and those shouldn't be regionally based. We should have three or four of those people around the country that could be funded out of the national pot. Then you need people to provide technical assistance and more soft skill relationships with the areas instead of having these people fill both of those responsibilities. Those are two very different skill sets. People have plenty of responsibilities to deal with. This is a responsibility it is not a privilege.