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Bernard C. “Chick” Fagan
January 11, 2017

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

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I went to work for the Bureau of Outdoor Recreation (BOR) in their Philadelphia Northeast Regional Office in 1972. For the first four years I worked in the Grants-in-Aid Division, which administered the, state side, of the Land and Water Conservation Fund (LWCF). I wanted eventually to get into resource planning, so I moved over to that section and worked on Wild and Scenic Rivers and what they called Special Area Studies. Before I left the regional office, I dedicated most or all of my time to the New Jersey Pinelands National Reserve and helping to get that off the ground. This included working on the statutory authorization for the Reserve, drumming up support for it, providing support for those entities who wanted to see the area protected into the future, and preparing the Environmental Impact Statement on the Pinelands Comprehensive Management Plan. After the Plan was approved, I provided staff support to the Secretary of the Interior's representative on the Pinelands Commission.

The BOR was independent from the NPS and owed its existence to the 1962 ORRRC (Outdoor Recreation Resources Review Commission) Report, the most exhaustive report ever issued on outdoor recreation in America. Laurance Rockefeller was the chairman of the commission and there were a lot of other big names on it. They were trying to set direction on where we should be going as a nation; what are the needs, what should be the roles and responsibilities of the public-and private-sector providers, and so forth. There were a lot of different interests represented; wildlife conservation and preservation, hunting opportunities, recreational fishing, scenic resources, physical fitness, etc. There were also leaders from progressive state park systems and people who recognized the economic potential associated with recreation. Tourism was a growth industry; if you wanted to get people to come to your state and spend their money, you needed to invest in things like parks and campgrounds that would bring them there.

Among the factors that came into consideration was the need for outdoor recreation planning by, and coordination between, the federal land management agencies, as well as between the federal government and the states. Some of the states were more active or progressive than others in trying to meet their citizens' and out-of-state visitors' needs for camping and outdoor recreation, fishing and hunting, etc. The ORRRC Report recommended that an independent agency, a non-land management agency, be given leadership responsibility for encouraging that sort of planning and coordination, and for preparing a nationwide outdoor recreation plan, pursuant to P.L. 88-29. Thus, the Bureau of Outdoor Recreation was created to coordinate with the Forest Service, NPS, BLM and Corps of Engineers, and with the states as well. The idea of a nationwide outdoor recreation plan was a very big deal with important implications for the quality of life in the United States.

The nationwide plan was supposed to be done every five years and the last one was done by the Heritage Conservation and Recreation Service (HCRS) the successor to the BOR, in 1979. Bob McIntosh was in charge of that last one. Bob later became the regional director of HCRS's Philadelphia office when I was working on the Pinelands. I think the statutory authority to do the updating of the recreation plan is still on the books, but no one has had the energy or political will to take it on.

The ORRRC report also recognized that, to achieve the objectives of the report, the federal government should provide funding assistance for the planning, acquisition, and development of outdoor recreation resources. The commission came up with a scheme under which the funding would come from the sale of offshore oil leases, a tax on motorboat fuels, and public land entrance fees. It was called the Land and Water Conservation Fund (LWCF). The LWCF would go not only to the federal land-managing agencies for recreation land acquisition, but also to state and local agencies. Including the state side was one of the brilliant things that came out of that ORRRC Report. Funds were apportioned to every state based on a formula. There still are people in the NPS now whose job it is to oversee that apportionment. Some years, the funding has been cut way back, sometimes zeroed out. But because every state got a piece of the action, every congressman would have a reason to support it politically.

I remember as a neophyte reviewing the grant applications from New York State and Pennsylvania. It was 50% matching funds, so there was an incentive for the states to come up with their own money. Some states, like New York, would pass bond issues. They could use the LWCF for acquisition and for development of parks and playgrounds. There are parks and playgrounds all over America that wouldn't be there if it weren't for the Land and Water Conservation Fund Program and the comprehensive planning that goes with it. Planning helps ensure that you don't just spend money willy-nilly. We need to think ahead. Where are we now? Where do we want to be? How are we going to get there? So, every grant application that came in was evaluated. Before we told a state that its proposal was approved, the Washington office would notify the local congressman so that he could issue a press release and claim credit for it. Then we would tell our state counterparts. There was a lot of political savvy, which was an eye-opener to me at the time that went into figuring out how to make the program work.

The LWCF program had some unpopular aspects. For example, if you took the money you were required to forever manage the area for park and recreation purposes. It is against the law to change it to non-recreational use. That is one of the things the people who manage the program have to monitor. Changes in use require prior approval from the Secretary of the Interior and a commitment to a suitable replacement. This aspect of the program was, and is, vitally important, because open space and parkland has historically been sacrificed to highway rights-of-way and other public and private schemes that compete for land.

I then moved into resource planning and Wild and Scenic River (WSR) studies. In addition to identifying potential Wild and Scenic Rivers that might be managed by the federal government, the WSR program encouraged states and local governments to conserve river corridors. One of the big concerns then, as now, was government over-reach. The arguments then and now are still about the degree to which the government can tell you what you can and can't do with your land. That is one of the issues that always comes up, and it stems from the Constitutional prohibition against government entities taking property without just compensation. When legislation is proposed to establish a WSR (or a heritage area) there will always be those voices that question why we need it. Why is the government going in there and telling people what they can and can't do? Why is the federal government poking its nose into state and local government business and encouraging them to regulate people's private property and set onerous land use restrictions?

When I was doing studies up in New England, we were sometimes physically threatened. "What are you doing here? We don't want the federal government intruding on our state." It was always difficult to convince them that we had no plans to come in and take over their landscape; but we did want to encourage them to develop a conservation plan that would preserve a river's qualities for future generations and allow for public use and enjoyment of those places.

Every so often we would respond to a congressional or administration initiative. For example, in the 1970's the socio-political turmoil in the urban areas was still fresh in mind. And there was a belief in some quarters that the federal government should invest in the recreational needs of urban areas. Outdoor recreation is not just hunting and fishing out there in the rural landscape; what about the inner city? The LWCF allocations to the states could be used for that, and many states did invest money in urban parks and recreation. Some had their own grant making program for the urban areas. UPARR (the Urban Parks and Recreation Recovery Program) was a major federal initiative in that vein, administered by BOR. I don't think anything is actually done on UPARR now except some monitoring. The program has not been funded since 2002.

Yet another initiative that arrived with President Carter's administration was work on heritage. That is my first recollection of the term, *heritage*, coming into prominent use in my little piece of the federal bureaucracy. When Carter took office, he moved most of the external historic preservation programs out of the NPS and joined them to the BOR, which then was renamed the, Heritage Conservation and Recreation Service (HCRS). I was not then in a position to know much about the politics behind that move, which profoundly altered the BOR's mission. But I did understand that many of the historic preservation staff were happy to depart the NPS, believing that the NPS had little interest in supporting their activities beyond the national parks. Later, when the HCRS merged with the NPS, I became more aware of how insular most of the leadership within the NPS was.

With our new-found name, we embarked on a program to encourage our state counterpart agencies to adopt heritage programs. At first, based on my limited perspective, it seemed that this effort was closely aligned with The Nature Conservancy's heritage preservation efforts. But, given that the HCRS was also a major advocate for historic preservation, our notion of heritage went beyond that of TNC, and my recollection is that the HCRS drifted away from alignment with TNC. I would suggest that Kevin Coyle, Bob McIntosh or David Hales be consulted for a more accurate reading on how all this came about. We visited with our state counterparts, assessed the extent to which their existing activities might comport with a heritage program, and suggested ways in which they might align their activities to achieve this objective. The effort was not a huge success

Another thing that came up in the 1970's was the concept of Areas of National Concern (ANC's). If you are looking to the future and development is spreading out in all directions, then you need to look at whatever large natural landscapes may remain that have potential for conservation. My memory is a bit fuzzy as to the sequence of events back then, but other conceptual work was being done regarding Greenline parks and alternatives to national parks and large-scale land acquisition. Our ANC work acknowledged that not all these areas would rise to the level of something that the federal government should manage. I was assigned to partner with NPS staff in looking at the Worcester, MA and Providence, RI areas. We went out and

spent some time talking to local and regional planners, putting together a report on the future conservation potential for these areas. This particular initiative commenced on very short notice, using sketchy criteria. This was also when Glenn Eugster and a few other smart and high-energy people began to bring some new thinking to our staff. I don't know of any area that was ever formally designated an ANC, but I view the ANC work as a harbinger of the National Heritage Areas that came later.

My last assignment while at BOR/HCRS was to work on the New Jersey Pinelands, initially under Jack Hauptman and subsequently under Michael Gordon, Kevin Coyle, and Bob McIntosh. Throughout America we have always had high tensions between people who were proactive advocates for conservation and people who saw conservation as an obstacle to economic progress. This was certainly the case with regard to the Pinelands. In the 1960's John McPhee wrote a book about the New Jersey Pine Barrens, or Pinelands, an area comprising hundreds of thousands of acres of mainly pitch pine and scrub oak forests, swamps, and bogs. He pointed out the proposal for a jet port that would irreparably harm the integrity of this unique ecosystem. Also, people from New York City, Philadelphia, and northern New Jersey were moving into booming retirement communities in the area. That, together with scattered and piecemeal development, was threatening contamination of the aquafer that lay right below the surface of the Pine Barrens soils.

Fortunately, there were citizen activists who campaigned to save the area. BOR was asked to lead a study of its resource values and potential for conservation. We coordinated with the U.S. Fish and Wildlife Service and NPS on the study. NPS actually had more of a history with the area than did BOR. The NPS's scientific community had long thought that there was something special out there and something should be done to protect it. When you look at the area from an ecological standpoint, it is quite unique. We met with members of the New Jersey Audubon Society who were working hard to get public and political support for protecting the area. The Pinelands Coalition was another active group. But there were also farmers with extensive cranberry and blueberry holdings in the middle of the Pinelands who objected strongly to any serious conservation or preservation efforts. Real estate interests were also opposed to anything more than token conservation efforts. Our study recommended a program for the long-term protection of most of the remnant Pinelands ecosystem, with state leadership and federal assistance mainly in the form of funding and moral support. The program's success would depend on the state's willingness to regulate incompatible land and water uses in the area.

In light of significant state and public support, Congressman James Florio, Congressman Bill (William John) Hughes and Senator (Harrison Arlington) Williams co-sponsored legislation aimed at preserving a sufficient remnant of the nationally-significant Pinelands ecosystem, (P.L. 95-625, Section 502). The law called for a commission consisting of seven members appointed by the governor, seven members representing each of the seven counties, and one representative named by the Secretary of the Interior. David Hales, Deputy Assistant Secretary of the Interior, was the first of the Secretary's representatives. The legislators did not want the federal government to have management responsibilities; this was to be solely a New Jersey entity. Governor Brendan Byrne was supportive, and his seven appointees were advocates. However, we had doubts about several county representatives who seemed worried that it would affect adversely the economy of their counties. Some of them were clearly hostile toward preservation.

The commission had to come up with a comprehensive management plan which, if approved by the Secretary of the Interior, would result in establishment of the New Jersey Pinelands National Reserve and set in motion the distribution of funds to the state. My job at that time was to initially work with my boss to coordinate with the HCRS's Washington office, the Hill, and parties in New Jersey. The commission eventually appointed an executive director, who then hired staff and started the planning process. They reached out to the seven county planning offices and the home builders association in their planning efforts, and the result was the best plan we could reasonably expect for protecting the nearly one-million-acre landscape.

The most challenging thing from my standpoint was that we would have to prepare an environmental impact statement (EIS) on the plan before we could send it to the Secretary for approval. We had less than two months to do the EIS before the Reagan administration took office. When we brought the EIS to Secretary Cecil Andrus to approve, he was packing up his office to move out. It is likely that the National Reserve would not have been designated if we had waited for Secretary of the Interior James G. Watt to take office, since he was clearly hostile toward the type of regulatory scheme on which the Pinelands' protection plan relied. If that had happened, a huge amount of work by hundreds of people would have gone to waste and a conservation success story would have had an unhappy ending.

To me, the New Jersey Pinelands National Reserve is the first national heritage area. It has never been on the books as a heritage area, and I don't know why not. When I ask, people say the Pine Barrens does not have the cultural resources typically associated with a heritage area; but there are others who would disagree with that. For example, the National Trust for Historic Preservation had formed a committee to see what could be done to preserve the cultural heritage of the area. Historically, settlers couldn't grow the usual crops there, so the classic Pinelands ecosystem does not have a farming heritage like many other areas. However, it was the birthplace of the cranberry and blueberry industry in the U.S. Ultimately, the question of why the Pinelands is not an NHA probably does not matter.

One of the key lessons I learned over the years while working in the planning arena is that federal employees can help achieve important conservation successes not just through their stewardship of federal lands, or through dispensing federal funds to grant recipients. Another role is to provide advocacy, encouragement, and moral support to citizens and organizations willing to take on conservation challenges in the face of vocal, and sometimes well-financed, opposition. For example, the early advocates for Pinelands conservation efforts were sometimes ridiculed for wasting everyone's time on protecting an area with stunted vegetation, no scenic grandeur, and virtually nothing of value. Surely government funding and efforts should be directed toward other, more worthy endeavors. So, in this particular case, the most helpful and non-intrusive thing that federal officials could do was to verify and broadcast the national (and international) significance of the Pinelands ecosystem. When one considers that New Jersey is typically, but mistakenly, thought of as an industrial wasteland, a high value natural resource like the Pinelands should give the state's citizens something to rightly be proud of. And recognition of that value by a respected federal agency would at least give food for thought to a state's legislators and other decision-makers who may be uncertain as to whether the area is worth investing in.

In light of the eventual popularity and extent of the national heritage areas, some people have questioned whether there is really anything special about them. To people of this mindset, it almost seems like any landscape could qualify as a national heritage area and, therefore, the designation holds little meaning. I began working in an NPS park management position in 1982, before the Illinois and Michigan Canal was designated as the first National Heritage Area in 1984. Later, in 1990, I moved to Washington D.C. to work on the Hill under a new NPS fellowship program. While working on the Hill, I was assigned to assist the Republican staff on the Senate Energy and Natural Resources Committee. I was disappointed to see how disdainful they were towards the I and M Canal and towards parkland conservation efforts in general, regardless of whether there would be direct federal acquisition and management, or federal assistance to non-federal entities.

My first regional director in the BOR was a gentleman named Red Arnold, who was retiring just as the Pinelands legislation was under consideration. He was fond of saying, "let's make America a park." In essence, his maxim was dismissive of those who would argue over whether any particular landscape merits conservation. Instead, it suggests across-the-board application of a conservation ethic. In other words, let us be attentive to and appreciate all the wonderful places we are able to enjoy in America. Maybe that's the way to look at heritage areas, too. If there is an opportunity to foster a pride of place and respectful treatment of natural and cultural resources, and in so doing enhance our quality of life, why not take it? National Heritage Areas demonstrate that conservation, preservation, and economic development are not necessarily an either-or proposition.

After my stint on the Hill and a second year working in legislative affairs, I realized that I enjoyed working in Washington and looked for a suitable position. Carol Aten hired me for a job in the Office of Policy and I eventually worked my way up to be chief of that office. I truly enjoyed shaping a directives system and working with NPS subject matter experts to craft policies and procedures for managing NPS activities. I benefited in this position from having worked for eight years at Assateague Island National Seashore, a small to medium-size park, where I had hands-on experience with a wide range of national park operations, such as housing policy, land acquisition, facility management, cooperating associations, and answering questions in the visitor center.

Perhaps the biggest challenge while in the policy office was to twice edit, and contribute substance to, Part One of the NPS Management Policies, which governs management of the National Park System. Another special challenge before I retired was to prepare Part Two of the Management Policies. That document pertains mainly to the programs that came to NPS when it merged with HCRS. Some of the old-line NPS opinion leaders don't (or didn't) have much affection for those programs, so we did not have a comprehensive policy document for them. I wanted to do Part Two because I had worked previously with some of the programs, like the LWCF and Wild and Scenic Rivers, and felt they were underappreciated. My hope was that a catalog of these programs would lead to better awareness and understanding, both within and outside the NPS, of the great things these programs have contributed to our country. The document could also be deployed as a briefing medium for newly arrived Departmental officials or congressional staff.

NHA Policy issues: Over the years, there has not been a consistent understanding within the NPS regarding our relationship with the National Heritage Areas. They were originally conceived as an alternative to national parks, either because their inherent resources were not considered to be of sufficiently high quality, or because the presence of communities and industries would make them impossible to manage in the way traditional parks are managed, or because political realities preempted a prominent presence by the federal government. More likely, there would be a combination of these and other factors. But the role of the NPS in, for example, providing technical assistance, coordinating Secretarial appointments, reviewing management plans, and managing the distribution of appropriated funds necessarily led to very close relationships between NPS and heritage areas. And the local officials responsible for these areas did not always have available to them people who were prepared for the management challenges that these areas presented. As a result, it sometimes seemed logical to borrow NPS managers to perform that function.

I found it interesting that NPS managers seemed to view National Heritage Areas as subordinate to the NPS, which is in error. Few NPS employees realized it, but the early commissions appointed by the Secretary were subsets of the Department of the Interior, independent of the NPS, and not subordinate to the NPS director or regional director, or to any other NPS employee.

One of my recollections from the 1980's is of Randy Cooley, an experienced national park manager, helping to shepherd the Southwestern Pennsylvania heritage area into being. He also took on lead management responsibilities, and I remember him remarking how much easier it was for him to manage personnel issues, procurement, and similar tasks free from the constraints of federal regulations. He liked it so much that he quit the NPS to become the area's first executive director.

Later Michael Creasey and Jim Pepper had turns as executive directors of Blackstone. I remember being somewhat taken aback to see Jim Pepper wearing his NPS uniform and allowing the NPS arrowhead to be used in connection with Blackstone's management in the same way as it was used on national park property. Jim Pepper was a smart person, but I'm not sure he had thought through what it meant to the NPS's branding, or the possible conflict with the NPS's oversight role. In later discussions with him, we seemed to be on the same page about the need for clearer separation.

One of my jobs in the Policy Office was working with the Partnership Office on the NPS identity program, which included policy on appropriate use of the arrowhead insignia. We also tried to ensure that the rules governing the use of NPS insignia were enforced. The arrowhead represents the NPS brand and needs to be controlled with the same rigor that Coke, Disney, and other major entities control their insignia or logos. Much as I admire and advocate for heritage areas, they are not national parks. Indiscriminate use of the arrowhead weakens the NPS's position when confronted with commercial encroachment on its proprietary rights, which I had to deal with many times while in the policy office. It also confuses the public, who may reasonably think that they are visiting a national park, when they are not. Congress made clear from the beginning that these are not national park areas, and they did not want them to be national park areas. Misapplication of the arrowhead may be misconstrued as, mission creep, which raises the

hackles of some in Congress who look relentlessly for reasons to criticize the NPS. This is not to say that the NPS shouldn't proudly promote the assistance it provides to heritage areas. But there are ways to include the arrowhead symbol in national heritage area related materials while making clear that it is a, partnership arrangement with limited NPS responsibilities.

When I worked with Martha (Raymond) and Katie (Durcan) on our national heritage area policy directives I annoyed them endlessly about the need to make very clear that national heritage areas are not national parks. I had an ongoing concern because of the tendency of national heritage areas and NPS field staff to issue materials that implied an inappropriate relationship, for example, brochures, exhibits, and signs that showed the arrowhead in the same context as it would appear in a national park area. I'd been sensitized to this because I had been brow-beaten in the past by some of the political interests who are always on guard about what they believe is the NPS trying to take over places and inserting the federal government where it shouldn't be. We have to be careful not to feed into that narrative. The, identity, materials I had worked on with the Partnerships Office would not allow national heritage areas to use the arrowhead symbol in the same way that national park areas use it. Instead, there would be a graphic representation of the NPS working in partnership arrangements with national heritage areas.

Something I would ask Martha's office to do would be to monitor that kind of activity and discourage it from happening. Maybe Director Jarvis does not feel so strongly about it anymore. If so, that would represent an evolution of policy about use of NPS insignia.

This may sound like heresy, but I think the NHA program would have avoided some of the confusion issues if the HCRS had still been functioning. Since it was only a planning and coordination agency with no land management function, it could have maintained a clearer delineation between national parks and national heritage areas.

Role of NPS employees in heritage areas: NPS field managers are proud to wear the green and gray uniform, which tells everyone they encounter that they represent the NPS. And NPS employees tend to be wary when assigned to functions that may disconnect them from the mainstream national parks. So, I can understand why Frank Dean and Jim Pepper and others who are out there in the national heritage areas on behalf of the NPS might want to stay in uniform. It may also be that some national heritage area advocates would want to promote the NPS connection that way. But this, again, sends mixed signals, confuses the public, and is inappropriate. This may sound ironical, given the general lack of appreciation of NPS senior managers toward anything other than national parks, but I felt that some regional directors were inappropriately allowing or condoning their employees to have too intimate a relationship with the national heritage areas, sometimes to the point of conflict of interest. Obviously, they didn't see it that way, or see any potential compromise of their fiduciary duty to the NPS. The need to not work at cross-purposes with key members of Congress may have played a role here. I believe Randy Cooley did the right thing. He liked what they were doing in the Southwestern Pennsylvania National Heritage Area and he would have much more freedom without the NPS connection, so he disconnected himself from representing the NPS.

The role of NPS employees in shaping the heritage areas system is something of a question in my mind. I did not work closely with the regional offices regarding their national heritage area

activities and really cannot speak to it. Heritage areas blossomed into a phenomenon much more extensive than it started out to be. It seemed to me that in most instances you had a sort of consensus that there was something special about a regional area and it was not appropriate to be a national park; but there was sufficient interest locally and within the state to identify, conserve, and promote the area's historic and natural resources. With apparent success of the pioneer areas, others felt that they, too, should benefit from the NHA designation. The danger is, if you don't have some quality control criteria in place, their legitimacy is weakened. But what's the harm to society? Why not, if the outcomes are good? If we can just call it something that gives them status, makes people happy, and reinforces their commitment to do good things, then that should be okay. As Red Arnold said, "let's make America a park."

Since I was not involved in NPS's on-the-ground work with national heritage areas, I can only offer my assumptions of how that role played out. My impression is that the NPS has helped NHA areas by helping to bring structure to the planning process; helping to crystallize thinking about what makes a particular area, special; helping to create a comprehensive framework for conservation; and bringing its expertise to the design of interpretive and educational messages and media.

The federal commission. Prior to the NPS establishing a Washington-based NHA office, the national heritage areas had no home in the central office and received scant attention from the Department of the Interior. The early NHA commissioners were appointed by the Secretary of the Interior, in accordance with statutory authorization. Since the policy office managed appointments to advisory committees, that office was assigned to prepare appointment papers for the heritage area commissioners. The Legislative Affairs office would send us notification of a national heritage area designation and we would start the process for the appointments by the Secretary.

Keep in mind that there is a big difference between designating someone to merely provide advice on park issues and designating someone to manage and make decisions regarding a federal instrumentality. There were federal ethics rules and all sorts of paperwork associated with the appointees being, special government employees, needing clearances and that sort of thing. These were onerous and difficult to explain to the appointees, who typically had no experience with federal government rules and protocols. But one important thing that an appointment letter did was to give the imprimatur of the Department of the Interior. It linked appointees to the Department more strongly, because you then had something with the Secretary's signature on it, appointing you to the commission. Again, these early commissions were on an equal level with the NPS and not subordinate to it.

Appointments are important from the standpoint of prestige. However, in the earlier days of my working with national heritage areas, none of the Secretaries showed any interest in them, and there was no connection and oversight by the Department other than through the initial appointment letter. As years passed, the Department took on a much greater interest in who was being appointed. This seemed to be a direct response to evolving White House obsession over appointments at all levels throughout the federal government.

I felt that this lack of Departmental interest was a form of slight toward the appointees and could be a potential embarrassment for the Department in a congressional oversight hearing. To alleviate this problem, and with my supervisor's approval, I started preparing charters for the national heritage areas commissions. After all, we had charters for our advisory committees whose functions were much less important than the functions of the national heritage areas. The charters became the marching orders from the Secretary, with most of their wording derived from the statute that created them and from ethics standards applicable to special government employees. I'm not sure why the appointments and charters function did not shift over to the NPS heritage areas office when that office was established. I suppose it was because the policy office had an efficient system in place and there would be no need to duplicate that function.

The enabling statutes for national heritage areas evolved over time to get away from Secretarial appointments and being federal entities. Eventually, they changed from the Secretary appointing members, to state/local authorities making appointments, or to an existing entity taking over lead responsibility. This was a major change in policy, with significant ramifications. There was no longer a need for the formal appointment letters or charters. In fact, the commissions were no longer part of the Department of the Interior or the federal government. It should also have removed any confusion about whether these areas were part of the national park system.

Benefits of heritage areas to the NPS: Many NPS traditionalists would see national heritage areas as siphoning off energy from the NPS's core mission, which is managing the national parks. On the other hand, we have seen people like Randy Cooley and Frank Dean, who wore proudly the green and grey uniform, embrace the national heritage areas. I think they would see the national heritage areas as something valuable and complementary to the NPS's mission. If you ask the average man in the street, they don't really know much of anything about the NPS. So, if a very large chunk of terrain is designated a national heritage area, then you probably will have more visibility and awareness of the NPS. To the extent that the NPS is playing a role in the heritage areas, I think it leads to NPS gaining some measure of public support along with the heritage area. In that sense it would be a positive thing for the NPS to be associated with them. Also, it's nice to have the political officials in the areas feel like they are getting a benefit from the NPS presence.

Although as a general matter I think an association with the national heritage areas is beneficial to the NPS, we need always to be clear that the national heritage areas are not managed by the NPS and not managed under the same laws and policies as the national parks. NPS areas must be managed under a consistent set of standards and policies, which help define them as national parks. We know that the national heritage areas don't want to be managed that way, nor should the NPS want to see them managed that way. National heritage areas have a different purpose in life, so let's make sure there is a clear divide there. A clear division helps us avoid giving ammunition to the naysayers who are always looking for ways to criticize the NPS for doing things they think the federal government should not be doing.

NPS oversight of the heritage areas: As best I can tell, the national heritage areas started life as the products of regional office activities, and with no regional staff having experience with them. In the early years, national heritage areas had no home in the Washington office and received scant attention from the Department of the Interior. We in the Washington office really

didn't do any monitoring of them early on, before there was a National Heritage Areas office. The closest thing I can remember to oversight was a conference sponsored by the policy office, when Carol Aten was the office chief, attended by representative of all the national heritage areas commissions at that time, to identify issues that needed resolution or guidance.

I think we should view the NPS oversight as a quid pro quo situation. For example, with the Land and Water Conservation Fund program we give a community funds and they promise to care for that investment in perpetuity. And in the case of the Pinelands, for example, the federal statute says, provided the state of New Jersey does *A*, then the Secretary of the Interior will do *B*. These are a form of quid pro quo. Similarly, the NPS must perform oversight to ensure a national heritage area honors its commitment. The heritage areas should be monitored on doing what their enabling legislation requires and what their plan says they must do. This may be difficult at times because some of these areas are so big and amorphous. And it seems that, as the national heritage areas grew in number, their political strength at times made it difficult for NPS managers to assert authority in any event. This should probably be expected, since the national heritage areas were never really subordinate to the NPS.

Oversight is an area in which citizen advocates become so important. The fact that officials wanted a heritage area means that there are political support groups. I would expect that those supporters would be whistle blowers if the heritage area was not meeting its commitment or their expectations. Things can start going wrong and that is when you need to have an educated constituency, like in the Pinelands. The Pinelands Alliance is the watchdog now. They are watching the commission and watching people who get permits from the commission. When the commission starts bending the rules, right away the people blow the whistle and protest to the governor and Secretary of the Interior and reach out to news media. That's why, to me, it's important to have that local political support base of concerned activist citizens. They become your eyes and ears.

Perhaps the heritage areas office could develop a checklist of protocols, if they don't already have one. If we receive a report from somebody that a commission is not doing things that it said it would do, we'll take the following steps to evaluate the situation on the ground. If there is a problem, we will advise the commission that they are not in conformance with their agreement and they are jeopardizing the flow of funds. Doing this is fraught with risk; but they wanted to be designated a heritage area and Congress agreed, gave them the money, and assigned NPS to administer an oversight role.

Division of NPS labor related to heritage areas: When you have an array of locations across several regions and a need for some level of consistency in how to manage the overview function Service-wide, then the Washington office is the logical home for that activity. And when national policy is being formulated that will apply to all the regions and national heritage areas, then that's a Washington office role. Assuming we like the heritage area program, and we do, advocating for it with Congress would also be a role for the Washington office. If there is a problem or an issue that is going to get the attention of a congressman, the Legislative Affairs office wants to know about it, and the regional office should make sure that the Washington heritage areas office is aware of it.

I did not follow closely how the regional offices manage their national heritage area activities, and so I can speak only in general terms about it. The usual thought is to delegate out whatever you can to whoever is closest to, and most knowledgeable of, the on-the-ground action. From what I have seen, the regional office typically defers to a field employee, perhaps from a nearby national park area, to coordinate on a daily basis with the national heritage area representatives and other local interests. As we have also seen in some cases, NPS field staff have even taken on direct management roles with the consent of the national heritage areas.

But it is vitally important that field staff in that position, and who may not be well-versed in Service-wide policy, keep in close touch with regional and Washington staff who may be more aware of potential pitfalls. In those cases where appointments are made by the Secretary, the policy office relies on field staff to provide the necessary background information to support the nominations.

When I worked in a regional office there were times when we wanted moral support and political support. Support can happen best when there is ongoing communication within the NPS. Good internal communication also contributes to a high degree of continuity and consistency in working with our national heritage area partners. And of course, the benefits of good communication go both ways; on-the-ground staff can offer important, reality checks, to regional or Washington staff who are somewhat removed from the action.

Besides the division of labor, there needs to be a collective effort to answer the bigger questions, such as: What should our policies be? What guidance documents do we need to convey those policies? What materials and information should we prepare that will be helpful to NPS field staff and national heritage area managers? How do we best ensure that the national heritage areas see the NPS as a helpful partner and not an overbearing federal presence? Maybe a clearinghouse of best practices?

I have been encouraged and happy that heritage areas have evolved into something more than they were in the early days. There is now a formal structure in place for something that used to be somewhat amorphous. If someone in the state of Pennsylvania or Arizona or Florida wants to think a little bigger than they normally would about preserving open space and quality of life, they can now think about conservation and preservation on a regional scale. I think that's a good thing, acknowledging the fact that the primary motivation might be to attract tourists. And to the extent that NPS can play a role in encouraging it, that is also a good thing.