ABSTRACT

Title of Document: NATIONAL HERITAGE AREAS AS A SUSTAINABLE HERITAGE TOURISM AND PRESERVATION TOOL

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The purpose of this study is to clarify the role of National Heritage Areas (NHAs) in the field of historic preservation. NHAs have been largely misunderstood as tools for natural resource planning, whereas, NHAs are in fact effective preservation tools that support sustainable heritage tourism. This is demonstrated through an analysis of the formation of NHAs, which will lead to an evaluation of the ways in which NHAs incorporate the local community, protect and promote historic resources, improve the local economy, and achieve their intended outcomes. This is demonstrated through a case study, the Baltimore National Heritage Area, which shows that NHAs promote historic preservation and rely on partnerships to achieve their goals. In order for NHAs to be better understood, they should be promoted as unique regional tools and included in historic preservation literature.
NATIONAL HERITAGE AREAS AS A SUSTAINABLE HERITAGE TOURISM AND PRESERVATION TOOL

By

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Introduction

National Heritage Areas (NHA) have been designated by Congress as contributing to our national history, culture, and identity. Specifically, these are defined as where “natural, cultural, and historic resources combine to form a cohesive, nationally important landscape.”¹ NHAs may be rural or urban, focusing on the natural and/or built environment, or on themes related to American history.² The goal of NHAs is to promote heritage tourism by using cultural and natural resources to convey the heritage area’s national story. NHAs are an underutilized tool that offers the community a chance to participate in major preservation and heritage decisions through a management entity that acts as a partner and advocate. Thus, NHAs provide local citizens a voice in developing the plan for promoting the area and determining the activities that will be pursued, and to become directly involved in economic planning and fundraising. Given the many challenges facing preservationists in convincing the public of the value of preserving historic resources, NHAs represent a misunderstood and under-appreciated preservation tool.

The role of National Heritage Areas seems to be misunderstood by many in the preservation field. In his 2011 study, *Measuring Economic Impacts of Historic Preservation*, Rypkema points to the “creation and promotion of National Heritage Areas” as evidence for an increased concern for “public lands and outdoor recreation.”³ Rypkema’s focus on natural resources is misleading, however, and NHAs are not

² Alan W Barton, “From Parks to Partnerships: National Heritage Areas and the Path to Collaborative Participation in the National Park Service’s First 100 Years,” *Natural Resources Journal* 56 (Winter 2016): 24-25.
discussed anywhere else in the report. Contrary to Rypkema’s understanding, NHAs are actually meant to promote both preservation and conservation of the built and natural environment. Since NHAs also focus on the built environment, they support preservation of heritage on both public and private lands.

The success of the National Heritage program is evident in the growing numbers of NHAs across the country. NHAs also have enjoyed a remarkable level of bipartisan support in Congress during both Republican and Democratic administrations. Yet, NHAs are not usually discussed in the context of preservation tools and only in a limited manner regarding preservation economics. While the National Main Street program is acknowledged in the *Measuring Economic Impacts of Historic Preservation* as an economic preservation program NHAs are afforded no such analysis.\(^4\) Therefore, questions to be addressed in this study include whether NHAs are effective preservation tools; are their benefits related solely to tourism; and how can we measure the success of heritage areas?

To serve as an effective preservation tool, a program must protect historic resources, but also provide incentives for using or maintaining those resources. Furthermore, an effective preservation tool considers the values and desires of the community. Historic districts, ordinances, preservation plans, and historic tax credits are widely used and, in most cases, have been determined to be successful preservation tools.

Even when NHAs are viewed more broadly than just as a tool for protecting natural resources, they may be regarded as primarily aimed at promoting heritage tourism. Heritage tourism is emphasized as one means to measure the economic impact

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\(^4\) Ibid., 25-26.
of historic preservation. According to Rypkema: “Often when ‘historic preservation’ and ‘economics’ are mentioned in one sentence, the default response is ‘Oh, you must mean heritage tourism.’”\(^5\) This implies a direct link between historic preservation and heritage tourism, and that tourism is either the only, or the most important, economic benefit. Heritage tourism has been criticized as alienating the local population on the one hand, while dominating the policies of government as a result of its commercial benefits.\(^6\)

Heritage tourism has been demonstrated to yield significant economic benefits to communities. If managed properly, heritage tourism can bolster the community, increase investment in the area, and promote preservation. This is done directly through tourist spending on attractions, restaurants, hotels, transportation etc. NHAs have been proven to have a positive economic impact on their regional economies.\(^7\)

Heritage tourism and preservation are closely related fields, and sustainable heritage tourism practices encourage historic preservation. Sustainable heritage tourism seeks to mitigate potential negative effects of heritage tourism, such as overcommercialization of heritage. Sustainable heritage tourism tools encourage and maintain the involvement of the local community, resources, and economy.\(^8\) Preservation and heritage tourism tools share two main principles: including the local community in decision making and assessing their values, and protecting and promoting historic resources. Additionally, preservation tools provide incentives for preserving historic resources, while sustainable heritage tourism encourages local economic development.

Combined, these four principles will guide this study of NHAs to determine if they are

\(^5\) Ibid., 19.
\(^8\) Noha Nasser, 474-475.
successful programs that promote preservation and heritage tourism alike.

The crucial importance of community support in accomplishing sustainable heritage tourism and preservation will be considered in Chapter 1, examining the history of NHAs and the process by which they are designated. The history of NHAs reveals that they were created as an alternative to the traditional landscape management tools, such as National Parks. The NHA designation process creates a management entity, which represents the people in the area and promotes historic and heritage resources. The designation process is thorough and systematic, and is meant to solidify community support and involvement. It also focuses on the development of historic themes for the heritage area, which should translate into the values of the community, and ensure that significant historic and natural resources are being represented. Finally, and crucially, NHAs are unique in that the NPS is a partner, not a landowner or manager. NHA regulations are in place to ensure that the NPS has a limited role, thus allowing the community to take on more responsibility and agency. The outcome of the designation process should demonstrate that the community is involved with the creation and management of a NHA. Chapter 1 will address the question of regulation and incentives of NHAs.

The focus of Chapter 2 will be on measuring the success of NHAs. There are two major studies that attempt to define success of NHAs. The first focuses on how NHAs achieve their intended outcomes, concluding that the strength of their relationships with other organizations determines their rate of success. The second attempts to measure the economic impact of NHAs, and uses their economic impact as an indicator of success. This discussion will lead to a detailed analysis of one NHA in the next chapter to
enumerate and assess the value of its preservation projects.

The individual projects and objectives of the Baltimore National Heritage Area (BNHA) are considered in Chapter 3 to explore the effects of a representative NHA on preservation issues. The BNHA is also proven to have a positive economic impact on the regional economy. I will look at community involvement, resources, incentives, and economic impact to determine how BNHA has been successful in preservation.

Community supported heritage areas represent the synthesis of preservation and heritage tourism values. The historic themes, community support, management entity, participant networks, and economic impact ensure that heritage areas protect historic resources while leveraging them to increase tourism and re-invest in the community. The cause of historic preservation would be well served if preservationists were more aware of the benefits of NHAs, and sought to engage the community to promote sustainable heritage tourism.
Chapter 1: Community Involvement, regulations, and Incentives

Successful and sustainable preservation and heritage tourism tools must have community support and represent community values. NHAs fully incorporate the values of the community because they are community driven, involve the community in decision-making, act as a regional voice, and as an umbrella organization. In order to fully understand NHAs as community driven organizations, the history of NHAs and their founding legislation will be reviewed. This will lead to an analysis of the designation process of NHA and the role of the community, and consideration of how NHAs operate in the context of regulation and the promotion of historic resources.

The rationale for NHAs was developed in 1984 with the passage of the Illinois and Michigan Canal National Heritage Corridor Act. Congress established the Illinois and Michigan Canal National Heritage Corridor, a 100-mile stretch of canal in the state of Illinois, and designated a nineteen-member commission to manage it.\(^9\) The reasons for the Act are threefold: the area had a concentration of historic and natural resources that related to American history; the area was undergoing an economic depression; and, according to Congress, the historic and natural resources have “not realized full potential social value,” notwithstanding efforts by the state and local groups.\(^10\) Congress intervened with the intent of using economic development and heritage tourism to revitalize and preserve the area. It also recognized that there was no broad leadership over all of the diverse stakeholders in the region.


The movement to preserve the Illinois & Michigan Canal began in the 1970s through the efforts of local citizens and was heavily promoted by the Chicago Tribune. In 1980, the National Park Service published “a conceptual plan and implementation strategies for the corridor.”11 In conjunction with this report, “the Illinois Humanities Council and the National Endowment for the Humanities funded a series of public meetings designed to inform and engage the public throughout the corridor” in 1981.12 After a massive outpouring of public support, local businesses banded together to form the Upper Illinois Valley Association in support of the designation. Later in 1981, the NPS published their report and this plan would become the basis for the designation process of NHAs; this plan will be discussed in more detail later in the chapter.

The beginnings of the Illinois and Michigan Canal National Heritage Corridor exemplifies the role of the community in the designation and creation of all NHAs, in that NHAs were meant to: “facilitate grassroots preservation of natural resources and economic development in areas containing industries and historic structures.”13 Grassroots preservation ensures that the community is invested in actions of the NHA. In its testimony to the House Subcommittee on the National Parks and Public Lands, House Resources Committee, the NPS stated that: “In heritage areas it is the responsibility of the people living within a heritage area to ensure that the heritage area’s resources are protected, interpreted and preserved and it is the NPS’s responsibility to assist them in

11 Ibid., 474.
that endeavor.”  This approach to grassroots landscape management was an entirely new concept, which emphasized the NPS as a partner and not as landowner or manager.

From the beginning, NHAs were envisioned as a tool with specific objectives. The purpose of the Act was to: “retain, enhance, and interpret, for the benefit and inspiration of present and future generations, the cultural, historical, natural, recreational, and economic resources of the corridor, where feasible, consistent with industrial and economic growth.” These goals would be accomplished through a Commission focusing on development and interpretation.

The Act imposed boundaries for the Corridor and authorized a commission to manage the land and direct the preservation and interpretation efforts. The nineteen-member commission was a combination of appointed officials, from the federal to the county levels of government, as well as community members and stakeholder groups. The commissioners represented different interests, including government; conservationists, archeologists, and preservationists; and business and industry. The commissions for subsequent NHAs came to be referred to as management entities; creation of the management entity became part of the designation application process.

The composition of the Illinois and Michigan Canal commission demonstrates the balance between preservation/conservation and economic development/heritage tourism. Each focus received five appointments to the commission, thus giving equal weight to both concerns; the chairperson was selected from either of the two groups. Additionally, the Act states that “Members appointed under paragraphs (5) and (6) shall be selected

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15 Ibid., 473.
16 Ibid., 475-476.
with due consideration to equitable geographic distribution.” These paragraphs refer to the preservation and development groups, and ensured that all locations within the Corridor would be equally represented.

The composition of the commission represents the importance of the community involvement, as 10 out of 19 commission members represent non-governmental interests. The commission is charged with implementing its plan:

(1) assist the State of Illinois and nonprofit organizations in preservation, treatment, and renovation of canal structures; (2) assist Illinois in establishing and maintaining intermittent recreational trails which are compatible with economic development interests in the corridor; (3) encourage owners of property in or adjacent to the corridor to retain a strip of natural vegetation between recreational trails and development in the corridor; (4) assist in the preservation and enhancement of Natural Areas Inventory prepared by the Illinois Department of Conservation; (5) enhance public awareness and appreciation of the historical, architectural, and engineering structures and the archaeological and geological resources and sites in the corridor; (6) assist in the restoration of historic buildings in the corridor; (7) assist in the interpretation of the cultural and natural resources of the corridor; (8) assist in the promotion of the corridor resources; (9) encourage enhanced economic and industrial development in the corridor; and (10) ensure that access routes to the canal are identified and that corridor traffic is routed away from industrial access routes and sites. Authorizes the Commission to finance the installation of protective features in the corridor.18

These requirements can be broken down into specific areas: natural resource protection, natural resource development, preservation activities, interpretation/education, economic development, and partnership building, stressing the relationship between the built and natural environment and necessitating that both are to be preserved and promoted. The members of the commission determine where and how funds will be spent. For this

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reason, it is important that the commission be balanced and reflect community values – not just those of tourism or the development sector.

The economic development and preservation of the region would not have been possible without the designation of the Corridor, because the cultural landscape extends beyond county and municipal boundaries. It was this potential to serve as an avenue for cooperation and support across boundaries that led to the creation of NHAs, and was why the Illinois and Michigan Canal National Heritage Corridor was the first to be designated. A regional approach to preservation also allows for communities to engage who may be far apart, and NHAs are one of the only preservation tools that can address regional landscapes.

In its role as a partner, the NPS is limited in its actions and acts more as an advisor than manager. The Act also outlines the specific requirements of the Secretary of the Interior. These include:

(1) conduct specified inventories; (2) develop a thematic structure for interpretation of the heritage corridor story; (3) design and make interpretative materials; (4) provide technical assistance to the Commission for the restoration of historic buildings in the corridor; (5) provide brochures on the tax advantages connected with the rehabilitation of historic structures in the corridor; and (6) detail to the Commission two Department of Interior employees.19

These activities demonstrate the role of the NPS as a collaborative member of a larger network, rather than as the principal administrator of the Corridor. The NPS was only to provide guidance to the commission in “managing” the area to promote tourism by using the resources located within the boundary area; the NPS is instructed to act according to the wishes of the community.

In addition to limiting the power of the NPS, the Act allows the commission to form partnerships and establish advisory groups; however, the commission cannot purchase property. Because NHAs have their own management entity, NPS avoids the burden of administering the area and its properties.

The Illinois and Michigan Canal National Heritage Corridor Act laid the groundwork for the 49 existing NHAs. The Act was implemented to intervene in the management of historic and natural resources in order to promote them, encourage economic development, and mitigate losses. The Act was founded upon a management plan with a commission composed of federal, state, and local government officials, and representatives from both preservation and business concerns. The goal of the commission was to implement the management plan.

Defining the role of the management entity, demonstrating community support, and completing the feasibility study are the major components of the designation process to become a NHA. The NPS stresses that: “pivotal decisions relating to NHA designation rest on the support, commitment and capacity of those in the community.”20 The feasibility study must demonstrate public involvement, public support, and commitment by the “appropriate players.”21 Ten criteria are in place to evaluate the potential sites. These stress the cohesion of the area and its resources, its significant contribution to the history and culture of the United States, the support of the community, and the potential success of the proposed management entity.22

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21 Ibid., 5.
22 Ibid., 4-6.
The feasibility study may be prepared by community members, by a consultant, or by National Park Service staff. The study must define the study area and propose boundaries, which are supported by the resources and the themes that have been identified. Congress designates a defined area (similar to a historic district), which must maintain a degree of integrity that will allow for interpretation, and must have sites that will draw tourism. A strategy for public involvement must also be included, which should provide an assessment of public support and public education, and a plan to maximize participation.\(^\text{23}\) In addition to the themes, the study should also include an inventory of natural and cultural resources.

NHAs must contribute to the nation’s history, which is demonstrated through interpretive themes that are proposed in the feasibility study for the heritage area. Themes should be deduced from the history of the area and represented by the cultural and natural resources encompassed within the boundary. The themes may relate to both natural and cultural history. For example, the Champlain Valley National Heritage Partnership, designated in 1990 and located in the states of Vermont and New York in the Adirondack region, was originally designated based on two key themes: Making of Nation (the impact of the area on the creation of the U.S. and Canada) and Corridor of Commerce (the history of water-based trade in the area). They later added an additional theme, Conservation and Community (how the community interacts with the natural environment).\(^\text{24}\) These themes demonstrate the relationships between heritage and the built and natural environments, and place the area’s history within a national context.

\(^{23}\) Ibid., 6.
Another example of the thematic plan for a NHA is The Journey through Hallowed Ground National Heritage Area, which encompasses parts of Pennsylvania, Maryland, West Virginia, and Virginia and was designated in 2006. Their feasibility study identified three larger themes: land of conflict, reunification, and rebuilding; land of leadership; place of national beauty and rural character. Again, these themes place the area within the nation’s history and focus on the role of the built and natural environment.

The feasibility study must also address potential alternatives such as a state or local designation as a heritage area, in addition or as an alternative to national designation.25 In the case of The Journey through Hallowed Ground NHA, the study identified three management alternatives: continue with their current practice, apply to become a NHA, or operate as a privately organized heritage area. In addition to these alternatives, some states have their own version of NHAs, which recognize areas that have contributed to state history and identity. The states of Maryland, New York, Pennsylvania, and Oregon have their own heritage area programs. However, because The Journey through Hallowed Ground NHA spans four states, the designation of a state sponsored heritage area in each state would be inefficient. That said, the part of The Journey through Hallowed Ground NHA that is located in Maryland has been designated by the state as well (The Heart of the Civil War Heritage Area). The dual designation of a state and national heritage area provides them with an extra source of funding and support. It is not unusual for potential sites to seek Heritage Area designation at the local or state level before applying for NHA designation, essentially demonstrating operational capacity and impact for the NHA feasibility study.

The feasibility study for national designation must also address the economic feasibility of the proposed heritage area by developing a “conceptual financial plan.”26 The NHA program is intended to bolster heritage tourism, so this rigorous process helps to ensure the success of the potential NHA, while also evaluating public support and commitment. After designation, the NHA will usually receive federal funding for a specific period (typically ten years), which can be renewed.27 Funding is allocated every year and can be used for “staff, planning, and projects.”28 However, federal funding is conceptualized as helping with the startup of the area and not intended to last forever. Additionally, federal funding must be approved and allocated annually. Thus, it is critical that additional sources of funding are identified.

Another important part of the feasibility study is the creation of a management entity to implement the objectives that are outlined. What is referred to as a “commission” in the founding legislation for the Illinois and Michigan Canal NHA has become the “management entity” for subsequent NHAs. While the commission was composed of multiple individuals from different sectors, the management entity is less formally structured and can be a local government entity, nonprofit corporation, university, or private commercial enterprise.29 Through this management entity, the NHA partners with the NPS and local institutions, such as nonprofits, museums, schools, and others. A survey of NHA websites suggests that most NHAs are nonprofits.

The change in composition of the Illinois and Michigan Canal commission to the management entity model could be perceived as a negative development, since the role of

26 Ibid., 11.
27 Barton, “From Parks to Partnerships,” 41.
29 Barton, “From Parks to Partnerships,” 41.
the community and the primacy of its values would appear to be diminished. If there are no rules for the composition of the management entity, the community may not be appropriately represented. For example, the founding legislation for the Baltimore National Heritage Area states only that: “The Baltimore Heritage Area Association shall be the local coordinating entity for the Heritage Area.” When compared to the detailed composition of the commission in The Illinois and Michigan Canal National Heritage Corridor Act, it appears that there are no safeguards in place to ensure that community members are integrally involved as members of the management entity. In the current 19-member Commission of the Illinois and Michigan Canal NHA, 10 members represent both the preservation and business needs of the NHA community.

The Baltimore National Heritage Area Act specifies that the management entity must: “consider the interests of diverse units of government, businesses, organizations, and individuals in the Heritage Area in the preparation and implementation of the management plan; [and] conduct meetings open to the public at least semi-annually regarding the development and implementation of the management plan.” This is in contrast with the Illinois and Michigan Canal commission, where there was a mandatory component for community involvement as a result of the make-up of the members of the commission. Thus, the community’s values and needs may be represented in the BNHA management plan, but they are not accounted for in the make-up of the management entity itself.

Imposing rules for selecting board members of the nonprofit entity could improve the participation of the community. For example, the Northern Rio Grand National

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Heritage Area, Inc., a registered nonprofit in New Mexico, has a board of directors that includes: “one representative from each of the eight pueblos and the Jicarilla Apache, one representative from each of the three county governments, one from each of the main municipal communities (Santa Fe, Taos, and Española), one representative from the State government, and nine community representatives from throughout the Heritage Area.” This diversified make up ensures that all communities have a seat at the management table and thus a direct voice in accomplishing the mission of the Heritage Area.

A regional approach to preservation, conservation, and tourism is one of the main innovations of NHAs. This is explored in a study by Robert Billington in which he assessed the Blackstone Valley National Heritage Corridor for its effects on the area. The Blackstone Valley is in a district along the Blackstone River in Rhode Island and Massachusetts that played a crucial role in New England’s industrial development. By the 1980s, the area was facing economic devastation due to the closure of most of its textile companies. The Blackstone Valley had local support stemming from a cleanup effort during the 1970s, and the community sought to create a park along the river to attract visitors to the area in the 1980s. At this point, the efforts were local and disjointed across state lines, leading the states to band together to petition the NPS to review the significance of the area. In 1986, the Blackstone Valley was designated as a National Heritage Corridor, which represented a partnership between the state and federal governments and the local communities. The process also initiated a new regional approach to planning.\footnote{Robert Billington, “Federal leverage attracts private investment at US heritage sites: A case study,” \textit{The International Journal of Heritage Studies}, 10:4, 349-359.}

\footnote{Northern Rio Grande National Heritage Area, “Who We Are,” \url{http://riograndenha.org/What_We_Do/Who_We_Are/index.html} (Accessed October 1, 2016).}
The management entity is one of the major differences between NHAs and other historic preservation tools like historic districts. The management entity often creates a platform for the community, offers a regional approach to preservation, and spans municipal boundaries, all of which a historic district does not do. The management entity also acts as a partner or umbrella organization for other heritage resource players and stakeholders.

Sustainable and successful preservation and heritage tourism rely on community support. The history and designation process of NHAs has demonstrated that the community must be involved from the creation and throughout the life of a NHA in multiple ways. Community support is evident with the makeup of the management entity, and is reflected by the feasibility study. The themes that are selected represent community values, and the management plan determines the objectives and goals of the NHA.

While NHAs are successful in including the community, NHAs have no regulatory power over heritage resources within their boundaries. Even so, they should still be considered effective preservation because they complement other preservation tools, provide incentives for preserving heritage resources within their boundaries, and stipulate that the designation is based on maintaining the historic integrity of the built environment.

The absence of protective legislation is likely to be viewed as a positive factor in many communities. Communities and businesses have been shown to tire of legislation that they feel infringes upon their property rights. As Congress must designate each NHA, the absence of protective legislation has been shown to be a politically popular
alternative. Furthermore, NHAs can span municipal boundaries and can contain large areas of land. It would be difficult to enforce protective legislation if the NHA included numerous states or if it covered a large area. Additionally, compliance with the Secretary of the Interior Standards is a requirement for all physical interventions and projects undertaken by the NHA.

For these reasons, it is important that NHAs contain other preservation tools, such as historic districts and areas of historic zoning or ordinances, so that the character of the NHA cannot be significantly altered. Typically, NHAs do contain historic districts and protected natural resources such as parks or nature preserves. Additionally, NHAs could work with their local communities to advocate for other preservation tools, such as historic districts or zoning.

Even though NHAs do not protect historic resources through regulatory powers, NHAs can still be included in planning for historic resources and Section 106 reviews. For example, the Shenandoah Valley Battlefield National Historic District is involved in transportation and community planning at the federal, state, and local level. Additionally, this NHA holds easements to protect battlefields and owns land through a foundation associated with the NHA.34 Both of these methods ensure that the land is protected.

Another component of successful preservation tools are the incentives for preserving historic structures. One way that NHAs incentivize historic resources is through heritage tourism initiatives.35 This could include creating promotional materials, creating heritage trails, partnering with schools to spur field trips, and awarding grants for preservation activities. This is evident in the Illinois and Michigan Canal National

Heritage Corridor Act, where the Commission was tasked with both the economic development of the area as well as its preservation and conservation. In fact, development can only occur at historic sites, and they must be preserved.

Individual NHAs have their own programming, which seeks to promote and encourage historic sites. Programs can include interpretation, events, education, and grants. From a survey of NHA websites, almost all NHAs offer a grant program, most of which are open to nonprofits or local governments. For example, the Tennessee Civil War NHA offers grants “for programs and projects including interpretive brochures, exhibits, educational materials, and heritage tourism and preservation plans” to nonprofit or local governments. They also suggest other organizations that offer grants as well. Additionally, Tennessee Civil War NHA offers free technical assistance for developing heritage programs. Since one of the major goals of NHAs is to increase heritage tourism and development, they do not offer direct incentives to homeowners.

Programming is for heritage resources, which could include, for example, historic house museums, parks, or trails. The community benefits from NHAs by having an advocate and platform in the form of the management entity. Additionally, community members could benefit from increased spending and tax revenue in their area.

Another example of unique programming is the collaboration between the National Coal Heritage Area, the Coal Heritage Highway (a designated scenic-byway) and AmeriCorps Vista (Volunteers in Service to America). The Coal Heritage Highway through the National Coal NHA administers an AmeriCorps program that distributes AmeriCorps service members to qualified projects. Qualified projects should have a

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Ibid.,
focus area, such as “non-profit capacity building, economic development, community development, wastewater management, drug abuse recovery, and long term flood recovery.” Project applicants must be a nonprofit or local government entity. In the past, AmeriCorps service members have worked for various Main Street programs and the Preservation Alliance of West Virginia. This demonstrates that each NHA offers unique programming and incentives.

Chapter 2: Measuring the success of NHAs

There have been two major attempts to measure the success of NHAs, the results of which have offered differing conclusions as to what makes a NHA successful. Laven et al. approach success as the ability for NHAs to achieve their intended outcomes. A differing approach to the question, carried out by Tripp Umbach Consultants, is to consider the economic impact of NHAs, thus assuming that if NHAs have a positive impact on the regional economy then they are successful. Both studies will be presented here to provide an understanding of what makes a NHA a strong preservation and heritage tourism tool.

Management entities act on behalf of the heritage area and facilitate partnerships between businesses and organizations. This argument has been at the center of the rationale for the value of NHAs since the creation of the Illinois and Michigan Canal National Heritage Corridor in 1984. In three different studies, Laven et al. analyzed multiple heritage areas to determine which factors have made them successful. Each study built upon the prior one: the first study was based on interviews conducted in three heritage areas, including members of the staff and their partnering organizations; the second used a statistical analysis of these interviews; and the third attempted to build a framework and model of heritage areas. The authors postulated that the strength of these partnerships was directly correlated to the NHA achieving its intended outcomes.

In their first study, Laven et al. found that an extended network is crucial in enabling NHAs to achieve their outcomes.\textsuperscript{41} The authors conducted interviews with representatives of the Blackstone River Valley National Heritage Corridor, Delaware and Lehigh National Heritage Corridor, the Cane River National Heritage Area, and their partnering organizations, in order to evaluate how it was that NHAs achieved their “intended outcomes.”\textsuperscript{42} These were defined as: (1) creating partnerships, (2) conserving resources, (3) improving heritage tourism and interpretation, (4) and fostering economic and community development.\textsuperscript{43} These outcomes broadly align with the intentions of the Illinois and Michigan Canal National Heritage Corridor Commission and with the components of sustainable heritage tourism.

The network concept implies that resources are managed and distributed through a network of partners; these can be nonprofit, governmental, and/or private. The team conducted ninety interviews to help create the program model. They found that engaging a diverse network at the onset of the NHA is important for its eventual effectiveness and that NHA partnerships are similar to “‘collaborative complex adaptive networks.’”\textsuperscript{44} This means that the systems are dynamic; information is accessible for all actors, they “continuously explore possible response options to opportunities or challenges,” and that they work in both directions top-down and bottom-up.\textsuperscript{45} Therefore, the heritage area management entity is not authoritative, as they make suggestions to their partners but also hear suggestions from them.

\textsuperscript{42} Ibid.
\textsuperscript{43} Ibid.
\textsuperscript{44} Ibid., 208.
\textsuperscript{45} Ibid.
Networks allow for multiple voices to be heard, creating important avenues for community discussion. The network approach of the NHA means that they rely upon partnerships, rather than a single decision-maker. This means that smaller organizations, neighborhood associations, and small businesses alike can have a voice in decision-making, an approach that promotes relationships and allows for groups, who may not have interacted before, to meet.

In their second study, Laven et al. built upon their prior work by using quantitative network analysis to further investigate the connectivity of NHAs and to suggest that the state of their network can be used as an indicator of the progress and success of the NHA. They first interviewed the management entity to determine their partners. The list of the partners of the NHA was provided to the investigators, who then asked about any relationships they may have with the other organizations on the list. If there was a relationship it was coded 1, if there was no relationship it was coded 0. For example, the Baltimore National Heritage Area partners with the B & O Railroad Museum and the Great Blacks in Wax Museum. The authors would have interviewed staff of both museums and asked each if they were associated with any of BNHA’s partner organizations. If they were, their relationship would be coded 1. The data is directional, so if the B & O Museum indicated a relationship with the Great Blacks in Wax, it would be marked as 1. It is also possible for the Great Blacks in Wax Museum to indicate that they have no relationship with the B & O. Stronger networks have more reciprocal relationships (1 to 1).

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The authors used statistical analysis to determine how the organizations were connected, and found “the presence of social capital in each of the three NHAs as measured by network reciprocity and transitivity.” Transitivity in this case means that if partner organization A is related to B, then B is to C, so A is to C. Social capital is a relationship, which suggests that NHAs can be “venues for partnerships,” acting as a means for other organizations to work together when they otherwise may not. Admittedly, it is difficult for the authors to apply this study to a measure of effectiveness, but if the network enjoyed by a NHA is strong, then they are more likely to achieve their intended outcomes. For example, if one of the intended outcomes of Baltimore National Heritage Area was to create a new heritage trail, a strong network of partners could facilitate this objective by supporting the project, expanding the trail, and diversifying its message. Instead of acting alone, BNHA could use its network to achieve this outcome faster and more efficiently, by relying on its partners to supply information or to promote the new heritage trail. With more stakeholders the network would also suggest that there is a higher degree of mutual accountability.

In 2012, Laven et al. expanded upon their previous studies to develop a framework and model for managing landscapes based upon the data that they collected. NHAs can be a regional approach to preservation, and as such Laven et al. view them as a potential landscape management model. This article reiterates the conclusions of their past two studies and maintains that a collaborative approach is necessary and that networks help to carry out this approach. The model outlines the guiding strategies, core

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ingredients, activities, and accomplishments of NHAs.\textsuperscript{48} The goal of the study was to facilitate the creation of more cultural landscape management entities, and to focus on the role of heritage in mobilizing the community and for building community support. In this case, a shared sense of place and history acts as the glue for the partner organizations and local community members. They suggest that there has to be a regional identity that is relatable to both the public and private sectors, and that this regional identity acts as the catalyst for the heritage area.\textsuperscript{49} The role of heritage in the development of NHAs is another way that the community members are involved in the creation and continuation of the NHAs.

Laven’s interviews with NHA employees revealed that there are six “larger and longer term NHA accomplishments” that the three case studies shared. These are:

1. resource conservation and stewardship;
2. restoration and enhancement of regional character and a sense of place;
3. community revitalization, both in terms of economic as well as natural and cultural resource objectives;
4. a strong, durable network of NHA partners;
5. integration of NHA objectives across public and private sectors, level of government, and different social groups; and
6. a perception that the NHA is an essential organizational partner in efforts to enhance regional identity and viability.\textsuperscript{50}

The accomplishments demonstrate that NHAs are not solely a heritage tourism tool, because many of these outcomes focus on broader preservation and community development issues and activities. Some of these metrics can be hard to capture on a large scale, and it would be better to try to analyze individual NHAs to determine if they have achieved their goals and effected these changes. Interestingly, only one of six

\textsuperscript{49} Ibid., 769.
\textsuperscript{50} Ibid., 773.
accomplishments involves economics, which has been used as another way to measure the success of NHAs.\footnote{Tripp Umbach Consultants, The Economic Impact of National Heritage Areas (Feb. 2013).}

While Laven et al. emphasized the role of partnerships in the success of NHAs, another study pointed to the economic impact of NHAs as an indicator of their success. In conjunction with outside consultants, the National Park Service delved into the economic impact of NHAs. The study, entitled The Economic Impact of National Heritage Area, by Tripp Umbach and associates, focused attention on six NHAs in the northeastern US and then used economic analysis to extrapolate an estimate of the impact of all NHAs.\footnote{The six sites that they use are: Baltimore National Heritage Area, John H. Chafee Blackstone River Valley National Heritage Corridor, Delaware & Lehigh National Heritage Corridor, Hudson River Valley National Heritage Area, Rivers of Steel National Heritage Area, and Wheeling National Heritage Area.} Their methodology including using economic data, such as visitor estimates and operating budgets, which was combined with the results from interviews and focus groups.\footnote{Tripp Umbach Consultants, The Economic Impact of National Heritage Areas (Feb. 2013), 3-4.} The economic modeling software, IMPLAN, was adopted to model the economic impacts. The investigators analyzed one project from each study group in depth to further explore the impact at the local level.

The authors found that NHAs are the most impactful in three areas: visitor and tourism expenditures, operational expenditures, and grant making and support expenditures. Visitor and tourism expenditures are the “economic impact of visitors,” such as the money spent at hotels, restaurants, or attractions. This is the impact of heritage tourism, which is generated based on the resources located within the NHA, not the management entity itself. The total level of expenditure was calculated using “visitor counts prepared for the National Park Service, with a majority relying on partners and
visitor counts from the primary attractions and visitor centers in their areas.”

The authors then adjusted for “potential double-counting,” and used a three-year average of the adjusted numbers. The IMPLAN software enabled them to determine how much each visitor spent on food, attractions, hotels, and other activities. Based on this exercise, the authors estimate that NHAs have an annual impact of $12.9 billion nationwide, and that “the economic activity supports approximately 148,000 jobs and $1.2 billion annually in federal taxes.”

The majority, 99% of the $12.9 billion, stems from heritage tourism. The authors estimate that 1,749 jobs in “services to buildings and dwellings” are supported by NHAs annually. While this impact is only an estimate and therefore cannot be accepted without question, it demonstrates the vast contribution that NHAs make to the economy through tourism related spending.

One of the NHAs that the authors used in their study was Baltimore National Heritage Area, which was selected because it represented an urban-centered heritage area. The authors outlined some of BNHA’s projects and portrayed their struggle to capture local tourism from surrounding counties. The authors found that BNHA has “filled the void between the Inner Harbor and cultural institutions in outlying areas.” The Inner Harbor is a large tourism area in the oldest part of the city, but it is almost entirely comprised of relatively new construction. The Inner Harbor is included within the BNHA, because of the historic resources that remain. The BNHA has helped to bridge the gap between the new area and the historic city center.

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54 Ibid., 8.
55 Ibid.
56 Ibid., 4.
57 Ibid., 14.
58 Ibid., 15.
59 Ibid., 16-19.
60 Ibid., 17.
The authors analyzed the economic impact of BNHA and its partner sites. Using the procedures described, they determined that the annual impact of tourism and visitation was $313,678,182. The authors also found that BNHA annual employment impact is 4,142 jobs, meaning that the activities of the BNHA, its grants, and partners support more than 4,000 jobs annually. The authors also calculated the impact of BNHA’s grant programs. It should be noted, that the BNHA has both federally funded and state funded grant programs. Although the authors did not specify if they only used federal level grants or also state grants, they found that grant making activities have an impact of about $2 million annually. The grant making activities are an economic benefit for historic preservation, as the grants support both interpretive and brick and mortar projects. These grants call for a 50% or 75% match. They provide jobs for skilled workers and educators a like.

In this report, as with most heritage tourism studies, a significant challenge was to differentiate heritage tourism data from regular tourism data. The Maryland Heritage Area Authority (MHAA) recognized this problem in the 1990s, and addressed this issue in their 2010-2020 Strategic Plan, in which several of their objectives relate to “measuring program performance.” MHAA acts as the governing body for all 13 of the Maryland State Heritage Areas. The Baltimore National Heritage Area is the only Maryland heritage area that is also a federal heritage area.

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61 Ibid.
62 Ibid., 18.
63 Ibid.
In their strategic plan, MHAA outlined five ways in which they would attempt to measure program performance. First, they plan to create an internal evaluation tool, which will help all partners to give feedback and evaluate themselves based on a standard template. Second, MHAA will create performance measures to capture the funding leveraged by each management entity, activities completed, and the success of grant projects. Third, MHAA seeks to measure the products of each Heritage Area to determine if they were completed on time and how they related to their management plan. Fourth, MHAA will attempt to capture the return on investment of each Heritage Area by studying the economic impact of grants. Lastly, MHAA will collect, aggregate, and present this data.

From 2010-2015, MHAA worked to initiate this plan and in 2015 they produced, Maryland Heritage Areas Authority 2015 Annual Report to the Governor and the General Assembly, in which they evaluated the management entity performance and the program impact of all MHAs. While the Evaluation of Program Impact will be presented next year, the report contains useful data: the number of grant applications, grant funding allocated, and the total in-kind or cash match that was leveraged from 1996-2015. The report states that, “since 1996, the Authority has awarded approximately $27 million in financial assistance and leveraged over $99 million in non-state funds for heritage tourism and activities statewide. That is a direct return on investment (ROI) of approximately $3.67 in non-state funds for every $1.00 of state funds provided.”66 This investment manifests itself as construction, jobs, and taxes.

The success of NHAs has typically been measured in terms of their programmatic success and economic impact on the local economy. Laven et al. found that NHAs are more effective and thus more successful when they have strong partnerships with the community, local businesses, museums, government, etc. Tripp Umbach found that NHAs are successful programs because they generate money through heritage tourism, their operation, and their grant programs.

Success and effectiveness should be studied on an individual basis because the objectives of the NHAs differ. The overarching objective of promoting heritage tourism is difficult to measure because it has so many factors. There are some components that make NHAs as a whole unique and contribute to their popularity and possibly their success. These are: networking and partnership building, community involvement and education, the role of the NPS, and private investment. All of these factors should be addressed in a potential NHA’s feasibility study and a NHA’s master plan. For these reasons, it is beneficial to investigate NHAs at the individual level as a case study to understand the impact of the NHA and its success as a heritage tourism and preservation tool.
Chapter 3: Baltimore National Heritage Area

The previous chapter focused on measuring and assessing the ways in which NHAs promote sustainable heritage tourism and preservation, including stimulating economic development, promoting grassroots preservation, incentivizing historic resources, and supporting the community. The Umbach study has suggested that the Baltimore National Heritage Area has a positive economic impact on the city. For this reason, the BNHA will be the featured case study to further analyze its relationship with the community, historic resources, and the economy.

After years of effort by Baltimore City’s Commission for Historical and Architectural Preservation, the City of Baltimore, and the Maryland Historical Trust, the Baltimore City Heritage Area became a designated Maryland Heritage Area in 2002. Part of the planning process included the creation of the Baltimore City Management Action Plan in 2001, which recognized five goals meant to assist the heritage area in becoming a National Heritage Area. The first goal was to create a management entity. The second was to promote the historic attractions of Baltimore and to connect the new Inner Harbor to the historic city center. The third goal was to raise awareness for preserving Baltimore’s historic resources. The fourth, development, was to increase tourism and thus investment. The fifth goal was to revitalize Baltimore’s neighborhoods to increase tourism and improve living conditions for residents. At this point, the goals set forth at the creation of the Baltimore City Heritage Area align with sustainable heritage tourism practices: community involvement, protecting historic resources, and improving the local economy, as discussed in Chapter 1. As such, they draw on the

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support of the community to protect historic resources, while promoting economic development.

The Baltimore City Plan of 2001 had specific objectives set out for the Heritage Area, which was run out of the Mayor’s office. By 2005, the Heritage Area had achieved many of the objectives; among them was developing the Star-Spangled Trail, installing way-finding signage in the Fell’s Point neighborhood, creating the “Authentic Baltimore program,” and producing a documentary film. The projects were achieved by using public/private partnerships and set the groundwork for engaging the community and stimulating private investments. Baltimore City Heritage Area also continued to work on the other goals in the 2001 plan.

In 2005, the Baltimore City Heritage Area formulated a ten-year plan, part of which recommended that the boundaries should be expanded. The goals specified were: interpretation, preservation, economic development, neighborhoods, and management. Most of the goals were similar to their 2001 plan, except that interpretation now focused on interpreting natural and cultural resources, rather than solely cultural resources. In addition to these changes, the plan also called for a new interpretive framework to include five overarching themes.

The goal of expanding the boundaries of the BCHA was achieved in 2007 and included three new areas: Mount Auburn Cemetery, Cylburn Arboretum, and the Middle Branch of the Patapsco River. The current BNHA boundaries are based upon this expansion of the BCHA.

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68 Ibid., 1-2.
69 Ibid., 1-3.
70 Ibid., 1-4.
The State of Maryland has five criteria for the expansion of Maryland State Heritage Areas. The expansion area must: “contain a significantly high concentration of historic, cultural, and natural resources which attract tourists or have considerable potential to attract tourists.”\textsuperscript{71} The areas must also conform to the interpretive themes of the heritage area. There must be projects that will benefit from incentives offered by the state. The new boundary must overlap “to the optimal extent with other local, state, and federal ‘revitalization’ designations.”\textsuperscript{72} Additionally, there must be government or private businesses that are “prepared to commit resources to preservation and tourism development.”\textsuperscript{73}

Concurrently with expanding the boundaries of the State Heritage Area, Baltimore City Heritage Area and the City of Baltimore were also completing the feasibility study required by the National Park Service’s NHA program, and in 2009, the Baltimore City Heritage Area was designated as a NHA. The reasons for the designation are the concentration of historic and natural resources, major historical contributions to the nation’s history, and the successful feasibility study. Each theme will be discussed in great detail later in the study, but they are centered on: (1) the Battle of Baltimore, the Star-Spangled Banner and the flag; (2) significant contributions to black history and the “transformative effects of education” on Frederick Douglass and Thurgood Marshall; (3) the story of immigration in Baltimore; (4) and the “Nation’s first federally funded interstate transportation route, the National Road, [which began] its journey from Baltimore to the west.”\textsuperscript{74} The legislation also found themes that related to the natural

\textsuperscript{71} Ibid.
\textsuperscript{72} Ibid.
\textsuperscript{73} Ibid.
\textsuperscript{74} Baltimore National Heritage Act, H.R. 5279, 110\textsuperscript{th} Cong., 2d sess. (Feb. 7, 2008).
resources of the area such as the Chesapeake Bay and numerous Baltimore City Parks. These themes proliferate in buildings and locations within the heritage area. The resources of the heritage area were to be used to promote these themes, restore locations that relate to these themes, raise public awareness, and spur economic development.

In 2011, the management of BNHA was transferred from the Mayor’s office to a nonprofit management entity, Baltimore Heritage Area Association, Inc. In 2013, the BNHA created a new management plan, which is meant to bridge the goals and objectives of both the state and federal programs. The plan outlines the heritage area’s history and evolution, its goals and objectives, its partners, resources, and initiatives.

The 2013 Management Plan details the major accomplishments of the BNHA and explores how they relate to their stated goals. For example, the creation of the nonprofit Baltimore Heritage Area Association was a step toward their management goal. The creation of the Charles Street National Scenic Byway Map and Guide contributed to their goal of interpretation. The Civil War Sesquicentennial Commemoration Kick-off included a reception and performance and contributed to their goals of interpretation and economic development. These are only a few examples of completed actions of the BNHA.\(^{75}\)

The Role of the Community

The community was involved in the feasibility study and the creation of the BNHA, yet it appears that the role of community members has lessened since its initial creation. The public’s opinion was solicited for the creation of the 2013 master plan in April 2012 in the form of a public meeting, which had poor turnout. In addition to

holding a public meeting, the BNHA also held five separate stakeholder meetings. The stakeholder’s meetings were more successful, with a combined total of 70 stakeholders in attendance. Stakeholders included representatives from city agencies, historic sites, and museums, Friends Of groups, local businesses, institutions, Main Street programs, and neighborhood associations. This would suggest that the partnerships of the BNHA are strong and that the extensive network of partners represents the voice of the community.76

In addition to Board Members, BNHA also has a Heritage Advisory Committee of community stakeholders who represent business, museum, preservation, and community interests.77 This committee meets twice a year, but these meetings are not required. The composition of the committee “shall consist of members of the historical, cultural, and natural resource communities that made our designation as a state-certified and national heritage area possible.”78 This includes: city agencies, local historic sites, cultural intuitions, and businesses. The committee should also be “geographically balanced.”79 A full list of suggestions is included in the by-laws. The Heritage Advisory Committee is similar to the Commission for the Illinois and Michigan Canal National Heritage Corridor, except that it is in an advisory role and is not required to meet on a regular schedule.

Currently, the Baltimore Heritage Area Association is evaluating their current boundaries, with the potential to propose a boundary expansion at the state level. Their approach to this possible expansion demonstrates the role of the community in the

78 Ibid., B-6.
79 Ibid., B-7.
management of the heritage area. The process has involved contacting local community
activists in the proposed expansion areas. These discussions focused on understanding
the heritage of the community and how being incorporated in the heritage area could help
the community. It has also involved meeting with local stakeholders. Lastly, the BHAA
will organize community meetings to gauge support for the expansion. This approach to
the potential expansion demonstrates how the community continues to be involved in the
actions of the heritage area.

Resources and Programming

The BNHA includes a wide range of resources, including multiple city parks,
National Historic Trails, National Scenic Byways, Maryland Art and Entertainment
Districts, Baltimore Main Street Neighborhoods, National Register Historic Districts,
Baltimore City Historic Districts, and heritage and cultural resources. As discussed in
Chapter 1, NHAs have no historic preservation ordinances or protective legislation, such
as a Section 106 review. For this reason, it is important to understand that much of the
BNHA is in fact located within a national or local historic district, or is a city owned park
(Figures 1 and 2). Effects on resources located within National Register historic districts
must be taken into consideration in federal government actions or projects. Local
historic districts, designated as Baltimore City historic districts, have even more
protection because of the local ordinances, which dictate that the Baltimore City
Commission for Historical and Architectural Preservation (CHAP) must approve changes
to buildings within the district. Additionally, there are benefits and incentives available
to homeowners and business owners located with historic districts in Baltimore City
(Appendix A for a list of resources).
Figure 1: North Baltimore with historic districts and resources\textsuperscript{80}

\textsuperscript{80} Ibid., 2-2 – 2-7.
These two maps indicate the wealth of resources in the BNHA, as well as illustrate that a substantial portion of the area is protected by either national or local historic districts.

Interpretive themes are an important tool for organizing, managing, strategizing, and interpreting cultural and natural resources within a NHA. The BNHA has four interpretive themes that support the overarching theme of “American Identity” (Table 1).

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81 Ibid., 2-2 – 2-7.
Table 1: Interpretive Themes of the Baltimore National Heritage Area.

<table>
<thead>
<tr>
<th>Theme</th>
<th>Sub-theme</th>
<th>Examples of Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Upholding Independence</td>
<td>1A Maritime Conflict Sets the state</td>
<td>• Westminster Burying Ground,</td>
</tr>
<tr>
<td></td>
<td>1B The Battle of Baltimore</td>
<td>• Star-Spangled Banner National Historic Trail and Scenic Byway,</td>
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<tr>
<td></td>
<td>1C The Star-Spangled Banner</td>
<td>• Star Spangled Banner Flag House museum</td>
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<td></td>
<td>1D The National Anthem</td>
<td></td>
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<tr>
<td>2. Seeking Prosperity</td>
<td>2A Explorers and Entrepreneurs</td>
<td>• Fells Point,</td>
</tr>
<tr>
<td></td>
<td>2B Colonial Baltimore</td>
<td>• Baltimore Waterfront Promenade,</td>
</tr>
<tr>
<td></td>
<td>2C International Port on the Patapsco</td>
<td>• Carroll Mansion,</td>
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<tr>
<td></td>
<td>2D Immigrant Influx</td>
<td>• Phoenix Shot Tower,</td>
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<td></td>
<td>2E New Enterprises</td>
<td>• Baltimore Museum of Industry</td>
</tr>
<tr>
<td></td>
<td>2F Rise of Labor Unions</td>
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<tr>
<td></td>
<td>2G Roots of Education</td>
<td></td>
</tr>
<tr>
<td>3. Shaping a Monumental City</td>
<td>3A Parks and Public Works</td>
<td>• Babe Ruth Birthplace Museum</td>
</tr>
<tr>
<td></td>
<td>3B Architecture &amp; Monuments</td>
<td>• Baltimore Street Car Museum</td>
</tr>
<tr>
<td></td>
<td>3C Rails and Roads</td>
<td>• Rawlings Conservatory</td>
</tr>
<tr>
<td></td>
<td>3D Firsts in Baltimore and Industry</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3E Philanthropy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3F Pursuit of Knowledge &amp; Arts</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3G A Sporting Town</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3H Monumental Changes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3I Living Traditions</td>
<td></td>
</tr>
<tr>
<td>4. Gaining Freedom for All</td>
<td>4A Free Black Community</td>
<td>• Great Blacks in Wax Museum</td>
</tr>
<tr>
<td></td>
<td>4B Slavery in Baltimore</td>
<td>• Mount Clare House Museum</td>
</tr>
<tr>
<td></td>
<td>4C The Underground Railroad</td>
<td>• The Eubie Blake National Jazz Institute and Cultural Center</td>
</tr>
<tr>
<td></td>
<td>4D Religious Freedom</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4E The Civil War in Baltimore</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4F Early Voices for Equality</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4G The Struggle for Civil Rights</td>
<td></td>
</tr>
</tbody>
</table>

The first theme, “Upholding Independence,” focuses on the role of Baltimore and its citizens during the early 1800s. This is the only theme that is based on a specific time period. Its subthemes include: maritime conflict, Baltimore’s role in the War of 1812,  

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82 For an in-depth examination of each theme see page 6-2 and 6-3 of *Baltimore National Heritage Area Comprehensive Management Plan 2013*.  

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events related to the Star-Spangled Banner, and events related to the National Anthem.\textsuperscript{83}

There are museums, historic sites, and heritage trails that relate to the theme of Upholding Independence. Some of these include: the Westminster Burying Ground, the Star-Spangled Banner National Historic Trail and Scenic Byway, the Washington-Rochambeau Revolutionary Route National Historic Trail, and the Star Spangled Banner Flag House museum.\textsuperscript{84}

The second theme, “Seeking Prosperity,” focuses on what brought people to Baltimore from the 17\textsuperscript{th} century until the mid-1900s. The subthemes include: explorers of the 17\textsuperscript{th} century, colonial Baltimore, Baltimore as the port during the late 1800s and early 1900s, and the role of immigrants, new enterprises, labor unions, and education.\textsuperscript{85} Sites included in theme two include port areas in the city such as Fells Point and the Baltimore Waterfront Promenade, along with Carroll Mansion, the Phoenix Shot Tower, and the Baltimore Museum of Industry.\textsuperscript{86}

The third theme, “Shaping a Monumental City,” focuses on the built resources and intangible culture within Baltimore. The subthemes are: parks and public works, architecture and monuments, rails and roads (B&O railroad and the National Road), firsts in business and industry, philanthropy, pursuit of knowledge and arts, a sporting town, monumental changes, and living traditions.\textsuperscript{87} Examples of the historic sites that fall into

\begin{flushleft}
\textsuperscript{83} Baltimore National Heritage Area Inc. \textit{Baltimore national Heritage Area Comprehensive Management Plan}, (Baltimore, MD: 2013), 6-2.
\textsuperscript{84} Ibid., D-6 –D-38.
\textsuperscript{85} Ibid., 6-2.
\textsuperscript{86} Ibid., D-6 –D-38.
\textsuperscript{87} Ibid., 6-2 – 6-3.
\end{flushleft}
the third theme include: Babe Ruth Birthplace Museum (3G), the Baltimore Street Car Museum (3A, 3D, 3C), and the Rawlings Conservatory (3A, 3B, and 3C).88

The fourth theme, “Gaining Freedom for All,” recognizes the role of diverse people in Baltimore. The subthemes are: free black community (related to the War of 1812), slavery in Baltimore, the Underground Railroad, religious freedom, the Civil War in Baltimore, Early Voices for Equality, and the struggle for civil rights.89 Examples of sites include: the Great Blacks in Wax Museum, the Mount Clare House Museum, and the Eubie Blake National Jazz Institute and Cultural Center.90

Each theme ties into the broad theme of “American Identity.” The overarching theme suggests that Baltimore and its citizens have helped to shape America’s identity since its role in the War of 1812 through its role in the struggle for civil rights.

These themes provide a framework for ongoing programming in the heritage area. The BNHA offers four urban heritage trails and is currently developing two additional heritage trails.91 Heritage trails interpret the built and natural environment in addition to intangible heritage. Heritage trails are operated by urban rangers in the warmer seasons, and are interpreted by markers, maps, and guides to assist visitors in understanding the various resources. Heritage trails promote historic sites and demonstrate the value of local history and architecture.

BNHA programming extends beyond heritage trails to include unique, targeted programs, such as the African American Heritage Passport. This program was developed with support by PNC, a major banking company in Baltimore. Passports were available

88 Ibid., D-6 –D-38.
89 Ibid., 6-3.
90 Ibid., D-6 –D-38.
91 Ibid., B3-1.
at many local events and participants could visit sites that related to African American History within the BNHA boundaries. Participants then took a picture of themselves in front of the site for their passport. Those who completed the passport by a certain date were eligible to receive one of four prizes. This innovative program demonstrates a public/private partnership between the BNHA, City of Baltimore, PNC, and participating sites, and used technology and history to promote heritage tourism and education. They also offered programming based on the War of 1812, historic ships, and the Civil War.\footnote{Ibid., 3-1-10.} In addition to programming, the BNHA also offers grant programs, which will be discussed in the incentives portion of this paper.

The BNHA uses heritage trails and programming to promote historic resources by increasing awareness and visitation to historic sites. They create programming materials surrounding significant events that have shaped Baltimore, such as the War of 1812. All activities of the BNHA focus on the themes that were laid out, which shape the activities of the BNHA and represent their preservation priorities.

Incentives and Economics

BNHA also manages three grant programs in addition to the heritage trails and programming. The grants can be used for interpretive, planning, or brick and mortar projects. These grants directly employed skilled preservationists, craftsmen, and educators. The grant programs are funded by federal, state, or local governments separately, and each has a requirement for matching funds. The BNHA is a state designated heritage as well as well as a NHA. The Maryland Heritage Area (MHA) program can be allocated up to $3 million annually of state funds. During FY 2017,
approximately $2.7 million was allocated to the MHAs. This money is awarded in the forms of grants to each heritage area. These funds are distributed for staffing and managerial needs (via a management grant) as well as for various grant programs for properties located within the Heritage Area.

Nonprofit organizations and government entities located within the state boundaries can apply for capital or noncapital grants under the MHAA Project grant. Capital grants projects must have a “lifespan of over 15 years,” and may be either physical preservation work or a permanent museum exhibit. Capital grants are capped at $100,000 and noncapital at $50,000. All of the grants require a dollar-for-dollars match, some of which can be in-kind. The dollar-for-dollar match requirement can make the grants less accessible to smaller organizations. For this reason, the MHAs can spend up to 10% of their management grant on discretionary activities, such as small grants, which do not require approval and processing by the Maryland Historical Trust.

The Maryland Heritage Area Authority estimates that for every $1 of grant money invested, $3.67 is created. In FYI 2017, Maryland awarded the BNHA seven grants for a total of $353,300.00 (including the $100,000 management grant). Grants were used for programs or physical preservation activities. According to the MHAA study, these grants would have an impact of $1,296,611.00. The rate of the return on investment is compelling and clearly the economic impact is positive.

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94 Maryland Heritage Areas Authority, 2015 Annual Report to the Governor and the General Assembly, Maryland Historical Trust (2015).
Table 2: MHAA Project Grant Awards.

<table>
<thead>
<tr>
<th>FY 2017 Grant Awards Recipients</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;O Railroad Museum</td>
<td>$20,000</td>
</tr>
<tr>
<td>“The Great Railroad Strike of 1877”</td>
<td></td>
</tr>
<tr>
<td>Baltimore Chesapeake Bay Outward Bound School</td>
<td>$80,000</td>
</tr>
<tr>
<td>“Rehabilitation and Preservation of the Orianda Mansion”</td>
<td></td>
</tr>
<tr>
<td>Baltimore Heritage Area Association Management and operations</td>
<td>$100,000</td>
</tr>
<tr>
<td>Baltimore Heritage Area Association “Public Programming for Maryland Fleet Week &amp; Blue Angels 2016”</td>
<td>$28,300</td>
</tr>
<tr>
<td>Baltimore Museum of Industry “Repair &amp; Preservation of the Historic Crane at the BMI”</td>
<td>$55,000</td>
</tr>
<tr>
<td>Johns Hopkins University “Enslaved at Homewood”</td>
<td>$20,000</td>
</tr>
<tr>
<td>Peale Center for Baltimore History and Architecture “Accessibility Renovations for America’s Oldest Purpose-Built Museum Building”</td>
<td>$50,000</td>
</tr>
<tr>
<td>Total</td>
<td>$353,300</td>
</tr>
</tbody>
</table>

In addition to the MHAA grants, there are federally funded grants that the BNHA offers to nonprofit organizations that are located or whose activities will be located in the NHA. BNHA receives $400,000 annually from the NPS; this is subject to allocation by the federal government and can change. Part of this funding is used for the BHAA heritage investment grant, which is for heritage tourism projects that further BHAA’s goals as outlined in their Master Plan. These grants can be applied to planning, interpretation, programming or operations. The grants must be matched by 75% cash contributions; no in-kind services are permitted for matching purposes. The City of Baltimore contributes $145,000 annually, contingent upon city funding. Thus, BNHA

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96 Ibid.
received a total of $645,000 annually from local, state, and federal funds for grants and personnel costs.

Table 3: BHAA Heritage Invest Grants.\(^{97}\)

<table>
<thead>
<tr>
<th>FY 2016 Grant Award Recipients</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chesapeake Shakespeare Company (Mercantile Building Historic Exhibit)</td>
<td>$7,000</td>
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<tr>
<td>Chesapeake Conservancy (Brochure: The Harbor Trail: Creating Connections to the John Smith Chesapeake National Historic Trail in Baltimore) –</td>
<td>$5,000</td>
</tr>
<tr>
<td>Maryland Military Historical Society (African American Military History Exhibit)</td>
<td>$10,000</td>
</tr>
<tr>
<td>McKim Community Association (Print Materials to Interpret McKim's History for Visitors to its Historic Buildings)</td>
<td>$4,200</td>
</tr>
<tr>
<td>Baltimore Streetcar Museum (Museum Exhibition Upgrade; Development of Curatorial Plan and Exhibition Content)</td>
<td>$9,000</td>
</tr>
<tr>
<td>Waverly Main Street (Waverly Main Street Streetscape Planning and Design Project)</td>
<td>$15,000</td>
</tr>
<tr>
<td>Friends of Gwynns Falls and Leakin Park (Gwynns Falls/Leakin Park Visitor Center Planning for Interpretation and Visitor Experience)</td>
<td>$15,000</td>
</tr>
<tr>
<td>Carroll Museums (New Core Exhibit)</td>
<td>$14,000</td>
</tr>
<tr>
<td>Eubie Blake National Jazz Institute and Cultural Center (Operating Support)</td>
<td>$10,000</td>
</tr>
<tr>
<td>Baltimore Architecture Foundation (Operating Support)</td>
<td>$10,000</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>$80,200</strong></td>
</tr>
</tbody>
</table>

Table 4: BHAA Small Capital Grants.\textsuperscript{98}

<table>
<thead>
<tr>
<th>FY 2017 Grant Award Recipients</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;O Railroad Museum (Reboilering and recertifying the St. Elizabeth #4 Locomotive)</td>
<td>$10,000</td>
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<tr>
<td>Babe Ruth Birthplace Foundation (Babe Ruth birthplace renovation)</td>
<td>$10,000</td>
</tr>
<tr>
<td>Baltimore Herb Festival (Preservation of Winans Chapel in Leakin Park)</td>
<td>$15,000</td>
</tr>
<tr>
<td>Cylburn Arboretum Association (Renovation/stabilization of Cylburn Carriage House)</td>
<td>$15,000</td>
</tr>
<tr>
<td>National Great Blacks In Wax Museum (Façade restoration of firehouse)</td>
<td>$15,000</td>
</tr>
<tr>
<td>Pigtown Main Street (Installation of Pigtown weather sculpture)</td>
<td>$10,000</td>
</tr>
<tr>
<td>Preservation Maryland (Wayfinding signage in Hampden and Jones Falls Mill Corridor)</td>
<td>$14,000</td>
</tr>
<tr>
<td>Reginald F. Lewis Museum (Access and visibility improvements)</td>
<td>$7,000</td>
</tr>
<tr>
<td>St. Mary's Spiritual Center (Interior plaster restoration)</td>
<td>$14,000</td>
</tr>
<tr>
<td>Zion Church/German American Cultural Center (Hans Schüler Eagle statue restoration)</td>
<td>$15,000</td>
</tr>
<tr>
<td>Total</td>
<td>$125,000</td>
</tr>
</tbody>
</table>

In order to better understand some of the activities that are supported by the grants, one project from each category will be analyzed in detail.

For the 2017 grants, the Cylburn Arboretum Association received $15,000 from a city-funded grant program for the renovation/stabilization of Cylburn Carriage House. The Carriage house was built in 1880, and rebuilt in 1912 after a fire. It currently houses a nature museum.\footnote{Cylburn Arboreum, “Visit Us,” \url{http://cylburn.org/visit-us/nature-museum/} (Accessed December 10, 2016).} The project involved the stabilization of the porch. Cylburn Arboretum is a nature reserve that is open to the public and is available for special events. The stabilization of the porch will allow visitors to access the museum and will allow for its educational program to continue. This particular grant supports a brick and mortar project that supports education.

BNHA also funds larger restoration and preservation-related projects through state funded grants. For example, for FY 2016, Carroll Museums, Inc. was awarded a $90,000 grant for improvements to the Phoenix Shot Tower stairs and lighting.\footnote{Baltimore City Department of General Services, “City and State Funds Committed to the Phoenix Shot Tower,” Baltimore City, posted July 30, 2015, \url{http://generalservices.baltimorecity.gov/news/general-services-news/2015-07-30-city-and-state-funds-committed-phoenix-shot-tower} (accessed December 3, 2016).} The nonprofit, Carroll Museums, Inc. operates the Shot Tower; the building is owned by Baltimore city. The grant will go toward improving the safety of the stairs and will allow for public access to the roof. The program represents a partnership between the nonprofit, BNHA, Baltimore City, and the state. Once completed, the project will provide a unique experience for visitors and draw them to the area.

Museums and nonprofit organizations have received grants for planning purposes from the BNHA, including: to plan for museum exhibits, to plan restoration, to plan heritage trails, and for planning museum expansion projects. One example is the $7,000 grant that the National Great Blacks in Wax Museum received to carry out an economic
impact study. This study will guide future decisions related to the museum’s expansion and development.

Nonprofits can also apply for grants for interpretation related projects. An example is the $15,000 grant that the Pigtown Main Street received for directional signage. This will help not only tourists, but also will improve the appearance of the community and support local businesses.

The specific grants mentioned above will promote historic resources and increase heritage tourism. In the case of the Cylburn Carriage House, the local community will benefit from the stabilization because it will allow for the museum to stay open. This museum educates children on conservation issues and provides a unique experience to children in an urban area. The renovation of the Phoenix Shot Tower will transform the visitor experience in Baltimore and will draw tourists to that area. It will further strengthen the partnerships between the BNHA, the state of Maryland, and Baltimore City. The planning grant for the Great Blacks in Wax Museum will allow them to lay the groundwork for their expansion. This could transform the area by bringing in new investment. Lastly, the grant for way-finding signage in Pigtown will help to brand the area, guide visitors, and transform the neighborhood visually. These benefits extend beyond heritage tourism and promote preservation and the local community.
Measuring Success and Effectiveness

The success of NHAs has largely been determined by their impact on the regional economy and their ability to achieve intended outcomes. It has also been found that the strength of the NHA’s network is critical in achieving their desired outcomes; these networks also represent connections to a wide group of community stakeholders. Clearly, BNHA is successful based upon its positive economic impact as described in the Tripp Umbach study. This leads to the question whether BNHA is also effective based upon the strength of its network.

The economic impact study found that “NHAs play a substantial role in supporting tourism within their regions,” with an economic benefit from the BNHA of $313,678,182 annually.\textsuperscript{101} Overnight visitors make up 31\% of all visitors, yet they account for 75\% of spending.\textsuperscript{102} It is recommended that the Baltimore City Office of Tourism and BNHA work together to increase overnight visitors. The grant making activities of the BNHA had a total impact of $1,979,438 on the regional economy.\textsuperscript{103} This is from the grants, the matches, the return-on-investment, jobs and taxes.

BNHA supports preservation through its programming, including its robust grant programs, which have a return on invest of $3.67 for every $1.00 spent. Their grants demonstrate the extensive network of partners that BNHA has cultivated. At its recent annual meeting on November 17, 2016, BNHA had approximate 50 community stakeholders in attendance from all levels of government, cultural institutions, and local businesses, a testament to their strong network.

\textsuperscript{101} Tripp Umbach 16-17.\textsuperscript{102} Ibid., 17.\textsuperscript{103} Ibid., 18.
In preparation for the creation of their 2013 master plan, 70 local stakeholders attended meetings. This benchmark reflects the network of partners that are involved in the decision-making process. This demonstrates that the community is still involved in the NHA, and based upon the Laven et al. findings, that the BNHA is effective at achieving their outcomes. Laven et al. interviewed 30 partners at each NHA site to determine the strength and relationship of the NHA and its partners. Even though no interviews were conducted, we know from the grant program and stakeholder-meeting attendance lists that the BNHA is continually in contact with other nonprofits.

In their 2013 Management Plan, BNHA laid out 372 action-items. Each item is organized into a category of: interpretation, stewardship, heritage tourism, neighborhoods, and management. Each item has a time frame of 1-3, 3-4, or 5-10 years. Additionally, the project is categorized as “BHAA In-House” or “Collaboration.” Of the 372 action-items, 242 were categorized as “collaboration.” This means that 65% of their action-items depend on partnerships for success. This indicates that the BNHA depends on partnerships and networks in order to achieve a majority of their intended outcomes. Based on the studies by Laven et al., it is likely that the probability of success is linked to the strength of the relationships with the project partners.

While it is not possible to analyze each item, five separate intended outcomes from their 2013 management plan that were to be accomplished within 1 to 3 years provide a rough measure of effectiveness. These outcomes are a combination of action-items. The selected outcome will be concrete (i.e. there will be an associated product) and will be larger in scale. The objectives will be one of the first few listed in the action-

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104 Baltimore National Heritage Area Inc. *Baltimore national Heritage Area Comprehensive Management Plan*, (Baltimore, MD: 2013), Appendix E.
items list. Objectives will be considered to be met if BNHA has achieved their desired outcome, which will be determined based on searching the BNHA website and through interviews.

The first action item under investigation was to: “explore creating a grant program specifically for interpretative planning, and implement if feasible.” This objective was achieved in 2014 with the creation of the Heritage Investment Grant program, which is funded by the NPS. The Heritage Investment grant is for non-capital projects for: planning, interpretation, programming or operating. This grant has been successful with numerous recipients each year; Table 3 lists the awards for 2016. The grant program was established through a partnership with the NPS, and has strengthened relationships between the BNHA and its grants recipients.

One objective on their stewardship category is: “as part of the heritage area website, create a searchable database of the heritage resources that includes the following: brief description of the resource, address and basic visitor information, indication as to how resources fit within the BNHA interpretive framework, links to NRHP nomination forms…” This objective has been partially completed through the Explore Baltimore interactive map, which allows users to click on a heritage resource to see its location and basic information. The project was categorized as in-house with dedicated funding. Currently, there are no images or links to National Register nomination forms or approximate documents. Heritage resources are linked to their affiliated sites. The information regarding the historic neighborhoods is incomplete and missing. This project is ongoing as staffing allows.

105 Ibid., Appendix F.1.
106 Ibid., Appendix F.2.
107 The map can be found here: http://explorebaltimore.org/explore.
One heritage tourism objective is to “serve as the champion for heritage area partners’ grant applications by working with partners to strengthen their applications and by providing support letters.” This has been achieved in the form of grant writing seminars for applicants. There were at least two seminars offered in fall 2016, which were completely booked. Unfortunately, the names of the participants and grant applicants cannot be released. During these seminars, applicants are educated on grant writing skills and then work one-on-one with the BNHA grant coordinator.

As part of its “neighborhood” objective, the BNHA sought to “establish program elements and standards in support of a heritage neighborhood program. Include criteria for heritage neighborhood designation based on interpretive presentation, available visitor’s services, planning, and commitment to historic preservation.” This project was categorized as collaborative and the project partners were: “neighborhoods, BCHS [Baltimore City Historical Society], universities.” This project is ongoing and was most likely delayed due to limitations of funding. This action-item is likely to be achieved in FY 2017 due to the appointment of a NPS Urban Fellow to Baltimore.

One of the management action-items of the BNHA focused on increasing board accountability and transparency. The action-item is to: “Expand board governing documents to include policies and procedures regarding board operations and accountability.” This has been achieved through three board policies: board conflict of interest policy, whistleblower policy, and records retention policy. Additionally, in May, the BNHA published a white paper, “Moving Forward: A Vision for Future Governance

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108 Ibid., Appendix F.3.
109 Ibid., Appendix F.4
110 Ibid., Appendix F.5.
of the Baltimore National Heritage Area.”\textsuperscript{111} This paper expands the membership of the board of directors to include individuals from the private sector to focus on fundraising. Additionally, the paper proposed that the Advisory Committee be re-structured and take on more responsibility. Lastly, the paper proposed forming a Heritage Communities Coalition with representatives from all Main Street, Friends Groups, and Neighborhood Associations within the BNHA.

Three of these five action-items have been successfully completed and have achieved their intended outcomes. The two other action-items, creating a resource database and the heritage neighborhoods, are ongoing and are in the development stage. These items are set to be achieved in FY 2017. While the management plan listed these action-items to be completed in a 1-3 year timeframe from 2013, the groundwork has been laid and they are in-progress.

The BNHA grant program, stakeholder meetings, and their collaborative action items demonstrate how the BNHA has an extensive network of partners. In analyzed outcomes, it is apparent that the BNHA relies on partners, such as Baltimore City and the NPS to achieve their goals. Furthermore, they work with local stakeholders to promote and preserve their resources.

An effective preservation and sustainable heritage tourism tool must involve the community in decision-making, protect historic resources, incentivize the use of historic buildings, and have a positive economic impact. It has been demonstrated that NHAs succeed in these areas. BNHA has been proven to be an effective tool because it continuously involves the community through stakeholder meetings; it contains many

historic districts and participates in local preservation decisions; it incentivizes historic properties through programming and grants, and it has a positive impact on the regional economy through tourism, operations, and its grants. BNHA uses partnerships to achieve its intended outcomes and has fully achieved three of the five proposed outcomes that were analyzed in this study. It is actively working to achieve the other two using partnerships such as Main Streets, NPS, and the Baltimore Historical Society.
Conclusion

NHAs have been misunderstood as tools that focus solely on natural resource planning and for the promotion of outdoor recreation. This study sought to rectify this misconception by demonstrating that NHAs are an effective preservation and sustainable heritage tourism tool. This was analyzed in the context of the role of the community, the protection and promotion of resources, and the economic effect of NHAs. NHAs are effective preservation tools because they start with the support and input of the community, have a positive economic impact, and promote historic resources. NHAs are grassroots in nature: the creation of a NHA is community driven and stakeholders continue to be involved through partnerships. NHAs are also preservation and heritage tourism tools because they promote and preserve historic resources through their programming. This can be in the form of brick and mortar projects, interpretation, or planning. While NHAs have no regulatory apparatus, they typically contain them in the form of historic districts.

The BNHA demonstrates that NHAs are an effective preservation tool. The BNHA continuously involves local stakeholders in their decisions and seeks to mobilize the community, especially in regards to their possible boundary expansion. Additionally, the BNHA contains many protected resources. It incentives preservation through its programming, which engages with stakeholders through the grant program. Furthermore, the BNHA is proven to be effective because they have achieved three of their five intended outcomes within the identified timeframe. The two remaining objectives are in-progress and will be achieved in FY 2017.

In order to remedy the confusion surrounding NHAs, NHAs should be widely
promoted within the field as a value preservation tool. This could be achieved by including NHAs in literature on the economics of preservation. Additionally, NHAs should be recognized as a unique mechanism for regional preservation. NHAs can span multiple states or county boundaries; this is unlike most other preservation tools. NHAs should also be promoted as a means of allowing communities to participate in preservation planning and decision-making. When researching a property, preservationists should determine if it is located within a heritage area and should consider a heritage area as a source of support. Finally, since NHAs have no regulatory power, they should educate and promote the designation of historic districts.
Appendix A

I. National, State, and Local Registers: Protections and Incentives

In 1966, Congress passed the Historic Preservation Act, which authorized the National Register of Historic Places. The National Register is a list of historic places that are considered worthy of preservation. The National Register is administered by the National Park Service and the State Historic Preservation Offices (SHPO). There are five types of property that can be listed in the National Register. These are: districts, sites, buildings, structures, and objects. National Historic Landmarks are also included in the National Register. In addition to the National Register, many states have their own register, which “tend to include properties of state or local significance.” These state registers are modeled after the National Register and typically have similar criteria and considerations.

There are four criteria for evaluation and sites must relate to at least one of the criteria. These are sites that are: (a) “associated with events that have made a significant contribution to the broad patterns of our history,” (b) “associated with the lives of persons significant in our past,” (c) “embody the distinctive characteristics of a type, period, or method of construction…” or (d) “have yielded, or may be likely to yield, information

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Historic districts are particularly important in the discussion of Baltimore City’s historic resources, because Baltimore has their own historic districts in addition to the state and national level historic districts. Resources located within historic districts are typically classified as contributing or non-contributing. Contributing resources fit into the theme of the historic district and typically fit within the NR considerations. Non-contributing resources fall outside of the NR criteria or consideration. Non-contributing resources typically cannot apply for historic tax credits, or may apply for a lesser historic tax credit. Properties located within these districts can apply for historic tax credits.

important in prehistory or history.”\textsuperscript{114} In addition to the criteria, there are also considerations and restrictions. For example, typically sites must be at least 50 years old and must maintain their integrity.\textsuperscript{115}

If a property is determined to be eligible to be listed in National Register then it must be considered in government actions. Section 106 of the National Historic Preservation Act requires “Federal agencies to consider the effects of their actions on historic properties and provide the ACHP [Advisory Council on Historic Preservation] an opportunity to comment on Federal projects prior to implantation.”\textsuperscript{116} While Section 106 does not guarantee the protection of historic resources, it guarantees that the actions of the Federal government or funded by the Federal government will consider historic resources in their planning process. If the actions are found to have an adverse effect on historic resources then mitigation is likely.

States can also have their own version of Section 106. Typically called state 106 laws, these laws ensure that impact of state funded projects on historic sites will be considered. Sections 5A-325 and 5A-326 of the Annotated Code of Maryland of the Maryland Historical Trust Act of 1985 requires review of state actions by the Maryland SHPO.

a percentage of the investment back to the investor in the form of tax breaks. This encourages rehabilitation and also guarantees that historic resources are rehabilitated to the Secretary of the Interior’s Standards. Both states and local municipalities also have different forms of tax credits. Tax credit programs that are available to historic properties located within Baltimore City will be discussed further. Table 5 outlines eligibility requirements that are related to listing for tax credit programs. Please note that there are other eligibility requirements not listed here.

Table 5: Tax Credits and Specifications.

<table>
<thead>
<tr>
<th>Tax Credit</th>
<th>Specifications for application</th>
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</table>
| Federal Historic Tax Credit (20%)              | • Must be listed in the National Register individually OR  
• As a contributing resource to a National, state or local Historic District (requires NPS certification) |
| Maryland Homeowner Tax Credit                  | • Must be listed in the National Register individually OR  
• As a contributing resource to a National, state or local Historic District (requires SHPO approval)  
• Or is designated locally (requires SHPO approval) |
| Maryland Competitive Commercial Tax Credit     | • Must be listed in the National Register individually OR  
• As a contributing resource to a National, state or local Historic District (requires SHPO approval)  
• Is designated locally (requires SHPO approval)  
• Or "Located within and certified as contributing to the significance of the Certified Heritage Area" |
| Maryland Small Commercial Tax Credit           | • Must be listed in the National Register individually OR  
• As a contributing resource to a National, state or local Historic District (requires SHPO approval)  
• Is designated locally (requires SHPO approval)  
• Or "Located within and certified as contributing to the significance of the Certified Heritage Area" |
| Baltimore City Historic Restoration and Rehabilitation Tax Credit | • Must be listed in the National Register or City Landmark list individually OR  
• As a contributing resource to a National or Baltimore City Historic District |
As indicated in Table 5, the authorizing entity has discretionary power over projects located in historic districts. Interestingly, while the Maryland state tax credit programs recognize local historic districts, the Baltimore city tax credit does not recognize state historic districts. The Maryland state tax credits for commercial properties also recognize heritage areas, which differ from all of the other tax credits. For these reasons, it will be interesting to see where the different districts and heritage areas overlap.

Baltimore City has local historic districts and individually listed properties and monuments. There is no local Section 106 type of protection, however, listed properties must adhere to The Commission for Historical and Architectural Preservation’s (CHAP) guidelines and apply for permits through CHAP. This does not protect from city actions but it does attempt to protect historic resources from owner’s actions. The Baltimore City Landmark List mirrors the criteria and considerations of the National Register.
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