Chapter 7 • Management, Implementation & Business Plan	2
Introduction	2
7.1 Background	2
7.2 Role of the Commission	5
7.2.1 A Business Plan for the Commission	5
7.2.2 Managing the Commission Effectively	5
7.2.3 Commission Committees	6
7.2.4 A Continuing Federal Commission	
7.3 Elements of the Niagara Falls National Heritage Area's Partnership System	9
7.3.1 Partners	
7.3.2 Marketing Role and Partnerships	11
7.3.3 Federal Role	11
7.3.4 Tribal Government Role	
7.3.5 State Role	13
7.3.6 Local Government Role	14
7.3.7 Partnerships with Related Agencies	
7.3.8 The Need for an Organization of "Friends"	18
7.3.9 Thinking Regionally	18
7.4 "Partner Development"	19
7.5 Communications	20
7.6 Resource Development	22
7.6.1 Funds Available	22
7.6.2 Organizing for Resource Development	23
7.7 Operations and Staffing	24
7.7.1 Getting the Work Done – Staffing and Support	24
7.7.2 Financial Management	
7.8 Strategic Planning and Implementation	28
7.8.1 Overview: Critical Areas for Focus	28
7.8.2 The Importance of Annual Work Plans	28
7.9 Evaluation.	
7.9.1 Federal Evaluation in 2020	
7.9.2 Annual Evaluation	30
7.9.3 Meeting External Standards	30
7.10 Conclusion	30

Chapter 7 • Management, Implementation & Business Plan

Introduction

This entire management plan addresses both the Niagara Falls National Heritage Area as a whole and the Niagara Falls National Heritage Area Commission. This particular chapter, however, is organized largely to act as a business plan for the Commission. It addresses how the Commission is to be structured, how it is to engage in partnerships – framing most of its programs around the concept of "partner development" – how it is to communicate with the public and do its part in raising the funds necessary to implement this plan, and how it is to organize its operations.

This chapter concludes with a discussion of how the Commission expects to measure and evaluate its work, that is, to understand its progress toward the promise of this plan and how well it has managed its funds in the public interest. The Commission is the "keeper of the flame," the organization that communicates the vision for the heritage area. It must monitor implementation of this plan, which is designed to help the region achieve that vision, and organize adjustments as circumstances and opportunities suggest.

7.1 Background

This chapter must observe a number of conditions set in previous planning, the details of which appear in sidebars in the next several pages (Primary Goal Addressed, Conceptual Approach from the Preferred Alternative, and Statement of Mission and Values). First and foremost, the heritage area's federal legislation lays out the requirements for the management plan (see Appendix XX and further discussion in Chapter XX). The Commission has defined a vision and goals based on that legislation – derived from one of the Commission's earliest discussions and provided for public review and comment early on – and these have set general direction and intent for this plan. The vision and goals then guided the development of alternatives, or scenarios, for how the vision might unfold over the years given desired results and various options for programs and emphasis (all scenarios could meet the test of the legislation). Ultimately, after public review, the Commission chose a Preferred Alternative. This management plan as a whole is the detailed understanding of how to implement the Preferred Alternative.

A critical point for this chapter that underpinned the entire discussion of alternatives was the role of the Commission: how much to be a "player," that is, an entity that undertakes work of its own? Versus, how much to be a "coach," that is, how much to work through and for partners, enabling their growth and ability to develop and support the heritage area? This is answered in the preceding chapters' discussion of programs and actions. This chapter points the way toward organizing to make such programs a reality.

*****Sidebar: Primary Goal Addressed in Chapter 7

Heritage Area Management and Regional Positioning - Work to extend the communication, coordination, and cooperation among governments, communities, and organizations that are essential to regional success in heritage tourism.

*****END Sidebar

*****Sidebar: Conceptual Approach from the Preferred Alternative

- Provide a **forum to support heritage tourism collaboration**, maintaining the vision and articulating goals.
- The heritage area organization will play a lead or partnering role, filling critical gaps in creating
 high quality interpretation and visitor experience in such areas as hospitality programs and
 training, wayfinding, and visitor information and services. The organization will play a
 coordinating, facilitating, and supporting role in economic development, community
 enhancement, and environmental quality.

*****END Sidebar

*****Sidebar: Statement of Mission and Values

The work of the Niagara Falls National Heritage Area is to enhance public appreciation for the communities, significant historic and natural resources, and landscapes of the Niagara region. The National Heritage Area works through a network of heritage area partners who seek to make interpretive, environmental, economic, and social improvements that benefit residents and visitors alike. Where initiative is lacking, the Niagara Falls National Heritage Area Commission will take action to fill the gap. In pursuing this mission, the Niagara Falls National Heritage Area encourages historic preservation, recreational access, and environmental recovery. We value authenticity, cultural diversity, high-quality design, energy efficiency, regional and cross-border leadership, open communication, and transparent operations.

*****END Sidebar

*****Sidebar: Statement of Vision

The Niagara Falls National Heritage Area is an internationally recognized biosphere, cultural icon, and renowned destination of historical significance. It enables the growth of a sustainable regional economy and the conservation of its natural and cultural resources in ways that benefit and unite its people and places. Its natural splendor and meaningful heritage are shared with millions of delighted visitors and celebrated by its residents so that its environment and communities are thriving.

*****END Sidebar

*****Sidebar: What Is "the Heritage Area"?

"The heritage area" refers in many cases to the geographic region now designated as the Niagara Falls National Heritage Area. The Niagara Falls National Heritage Area Commission is named in the heritage area's federal legislation (P.L.110-229, Subtitle B, May 8, 2008) as its "local coordinating entity." The question "What is the heritage area?" becomes important in the management plan when use of the phrase "the heritage area" implies agency – an actor that should or will take some kind of action. In that case, "the heritage area" collectively refers to the Commission and partners (those organizations and governments that have acknowledged their stake in the success of the National Heritage Area). Much of the heritage area's management plan applies to both the Commission and those organizations and agencies with a stake in the heritage area's success, working collaboratively.

Where it is clear that only the Commission should or will undertake an action (e.g., organizing an advisory committee it will staff), the Commission is named.

Otherwise, those reading these ideas should understand that when the text says "the heritage area should (or will)..." (or when a sentence is silent altogether as to agency), it should be read in general as "both the Commission and partners, acting collaboratively, should (or will)...."

*****END Sidebar

*****SIDEBAR: P.L. 110-229, Section 472, Establishing the Niagara Falls National Heritage Area Commission

- (a) ESTABLISHMENT.—There is established within the Department of the Interior the Niagara Falls National Heritage Area Commission.
- (b) MEMBERSHIP.—The commission shall be composed of 17 members, of whom [emphasis added]—
 - (1) 1 member shall be the Director of the National Park Service (or a designee);
 - (2) 5 members shall be appointed by the Secretary, after consideration of the recommendation of the Governor, from among individuals with knowledge and experience of—
 - (A) the New York State Office of Parks, Recreation and Historic Preservation, the Niagara River Greenway Commission, the New York Power Authority, the USA Niagara Development Corporation, and the Niagara Tourism and Convention Corporation; or
 - (B) any successors of the agencies described in subparagraph (A);
 - (3) 1 member shall be appointed by the Secretary, after consideration of the recommendation of the mayor of **Niagara Falls**, New York;
 - (4) 1 member shall be appointed by the Secretary, after consideration of the recommendation of the mayor of the village of **Youngstown**, New York;
 - (5) 1 member shall be appointed by the Secretary, after consideration of the recommendation of the mayor of the village of **Lewiston**, New York;
 - (6) 1 member shall be appointed by the Secretary, after consideration of the recommendation of the **Tuscarora Nation**;
 - (7) 1 member shall be appointed by the Secretary, after consideration of the recommendation of the **Seneca Nation of Indians**; and
 - (8) 6 members shall be individuals who have an interest in, support for, and expertise appropriate to tourism, regional planning, history and historic preservation, cultural or natural resource management, conservation, recreation, and education, or museum services, of whom—
 - (A) 4 members shall be appointed by the Secretary, after consideration of the recommendation of the 2 members of the **Senate** from the State; and
 - (B) 2 members shall be appointed by the Secretary, after consideration of the recommendation of the Member of the **House of Representatives** whose district encompasses the National Heritage Area.

*****END SIDEBAR

7.2 Role of the Commission

The Niagara Falls National Heritage Area Commission communicates the management plan's vision and provides a forum for key players affecting heritage development in the region. It provides leadership and seeks success through strong communications, visible, well-designed programs, empowerment of partners, and articulation of high standards for the visitor experience. It spends federal funds – including but not limited to sharing those funds with partners through matching grants – and raises other funds to implement the management plan.

The Commission is not, in and of itself, the heritage area – the Niagara Falls National Heritage Area is a collective effort, involving organizations and agencies represented on the Commission and others with a stake in the success of the heritage area (see sidebar, "What is a Heritage Area?").

7.2.1 A Business Plan for the Commission

A business plan describes the role and functions of the enterprise (the Commission); describes its operation and functions in terms of products, services, and customer benefits; analyzes customer needs and how to market its services to customers; lays out strategies and a plan for implementing them; addresses the financing of the business; and states how the business will evaluate its progress. Those are business terms that need some translation to nonprofit and quasi-governmental organizations and to the "business" of a heritage area.

This section addresses the role and functions of the enterprise, the Commission. Its products, services, and customer benefits involve interpretation, heritage tourism and the visitor experience, community engagement, community revitalization, and conservation, preservation, and stewardship. In each of these topics, there are varied audiences – that is, the Commission serves three different kinds of customers, and many of them. They are residents, visitors, and organizational/institutional partners – nonprofit organizations and government agencies. "Customers" will "consume" interpretive and visitor experiences, or will benefit from programs that are offered through the heritage area and its partners. Considerations in each of these topics are addressed in-depth in Chapters 2 through 6, covering products, services, customer benefits, customer needs, and how to reach customers (audiences).

Given the great variety of work that this enterprise, the Commission, is to undertake, it is important to focus closely on how to manage it effectively, how to focus its actions strategically, and how to evaluate progress. Later sections in this chapter address these areas of the Commission's business planning.

A unique feature of a heritage area's managing entity's business plan is the emphasis on partnership. While the Commission will provide leadership for many initiatives as described in this plan, it is just as likely, if not more so, to focus on accomplishing its objectives hand-in-hand with partners. Much of this chapter focuses on key relationships with partnering enterprises and their respective roles, plus ways to build the capacity of partners through programs designed by the Commission together with its partners.

7.2.2 Managing the Commission Effectively

The Commission's programs, projects, and routine operations implement the management plan. The Commission's meetings should not focus on the details of these, however. Rather, they should be the place where Commissioners step back from day-to-day concerns and details to ask, "How is the management plan being implemented and what is our progress on our vision?" and, "How and how well is the heritage area obtaining the resources for implementation?"

Too many nonprofit executive bodies get caught up in the details and spend too much time on items of little consequence to the big picture – sometimes simply because such topics are what individuals serving

on these bodies understand best. It takes the collective work and determination of the entire body to maintain the "10,000-foot viewpoint" and stay out of "the weeds."

The best way to accomplish this direction is to craft a standard agenda built around the management plan's topics, examining the Commission's goals associated with each. Where the Commission is to provide leadership for specific programs or projects, it can ask committees to take the lead on the details, as discussed in the next section. The committee would check in with the Commission for direction as appropriate to the level of discussion to be sustained in Commission meetings.

The Commission itself is an important organization within the heritage area, as forum and leader, ideamaker and resource provider. In addition to progress on the heritage area's plan, the Commission's own growth and development, its culture, and its relationships deserve the Commission's attention, asking, "How are we doing as an organization?" Routine examination of this question is healthy and can be a topic of committee discussion using Commissioner surveys and interviews.

ACTION: Organize standing Commission agendas around the topics of the management plan and resource development to maintain focus on the "big picture." Use the Executive Committee to review and approve agendas for each Commission meeting.

7.2.3 Commission Committees

If the Commission's meetings are where the big picture comes into play, its committees, on the other hand, are the place where Commissioners examine the details of programs, projects, and routine operations. There are two kinds of committees – standard administrative committees commonly found in nonprofit and quasi-governmental organizations of a wide variety, generally established through bylaws; and groups organized to support mission and programs, that is, committees established for the long term through bylaws or other kinds of working bodies that may be temporary and/or combine non-Commission members.

Currently, the Commission's bylaws provide for one committee, the Executive Committee, comprising the four Commission officers and the National Park Service director's designee, and chaired by the Commission's Chairperson. This committee is responsible for establishing other committees; the Chairperson appoints members to these committees.

There are currently two committees established by the Executive Committee following a recommendation of the Commission:

- (1) A committee addressing finance and budget issues, which should be made permanent and tasked with examining the finances thoroughly prior to Commission meetings and explaining key points to the full Commission. The committee would also be responsible for overseeing annual financial reviews and providing a financial statement for the annual report. Financial management is discussed in a section below; and
- (2) **A committee addressing public outreach**, which should be made permanent and responsible for communications planning as described in a section below.

Other administrative committees should be considered as the Commission evolves to deal with operations:

(3) A committee to deal with governance – including such issues as bylaws updates, strategic planning, operational retreats and Commissioner training, and advising the Executive Committee

on the establishment of short- and long-term committees. In the latter role, this committee could assist in the task of documenting the "job descriptions" for these committees. It could also assist the Commission in seeking its nominators' actions in filling vacancies.

(4) **A committee to address resource development**, discussed in a later section. (For the time being, however, the finance and budget committee can provide some direction for this task.)

Other Commission committees are called for or implied in preceding chapters of this management plan, and later in this section, which would support the mission and programs:

- (5) **An Interpretive Committee and Committee of Historians**, both to support the ambitious interpretive plan laid out in Chapter 2, Niagara's Interpretive Presentation;
- (6) A Tourism Committee, or a series of working committees charged with particular tourism projects, either (or perhaps both) of which would be helpful in coordinating the ambitious plan for improving other elements of the visitor experience in addition to interpretation that is laid out in Chapter 2, Niagara's Visitor Experience, and for generally helping to stimulate heritage tourism. For example, the Commission expects to establish a two-level quality standards program and enroll attractions, events, and visitor services (businesses) that qualify; to stimulate a broad hospitality program, again with a recognition element for "Ambassadors" who have completed the program; to engage in the regional dialogue on wayfinding, and so on. Each of these is a large project with long-standing responsibilities; and
- (7) **An Educators' Advisory Committee or working group** to assist the Commission in developing the many programs for community and educational outreach described in Chapter 4, Community Engagement.
- (8) **A Research Advisory Group** to assist the Commission in outlining a program for historical research and devising research protocols, as described in Chapter 5, Preservation, Conservation & Resource Stewardship, section 5.4.
- (9) A Partnership Development Committee, discussed further below in a section of the same name. This committee would design programs to support partners, review applications for support, and otherwise insure that every action possible undertaken by the Commission supports partners in useful if not innovative ways.

Such committees are crucial elements in developing the system of highly engaged partners envisioned in this plan. They should be forums for developing and supporting programs, down to advising on resource development and staff work plans and even recruiting volunteers for events or specific work activities, or for service on certain committees as appropriate.

The great responsibility conferred on such committees should yield great results. This level of responsibility, however, needs to be recognized especially with respect to Commissioners' time. While the startup phase for the Commission that has included creation of this management plan has required meetings nearly every month, this is not a pace that can or should be maintained once Commissioners are also expected to devote considerable time to committee duties. Commission meetings consume a great deal of staff time as well as Commissioners' time – and time will be a precious resource for both in accomplishing many programs and projects.

ACTION: Organize standing Commission committees around critical long-term topics of the management plan and critical functions of Commission operations; be flexible as to committee assignments, membership, and responsibilities.

ACTION: In establishing each committee, provide a specific job description.

ACTION: Delegate detailed review of programs, projects, and operations to committees. Expect these committees to provide summary reporting in Commission meetings in relation to accomplishments of the goals of the management plan.

ACTION: Arrange Commission meeting schedules to support Commissioners' spending time to support Commission committees as well as to attend Commission meetings.

A critical "best practice" for maintaining long-term coherence of Commission policies and decisions is the creation of an operations manual that describes such things as the roles and responsibilities of committees and current members. It might actually be a series of volumes or files that includes such items as job descriptions and other human resources policies. A paper copy in this instance is desirable for the sake of document integrity and preservation, maintained in a safe location; its contents can also be maintained on computer.

ACTION: Establish an operations manual documenting all Commission policies and procedures.

7.2.4 A Continuing Federal Commission

The federal legislation that established the Commission provided for its "sunset" five years after its passage, on May 7, 2013; Congressional authorization for the heritage area's funding, however, sunsets on May 7, 2023. The variance in dates was designed to encourage final resolution of the question of what is the most desirable form for a local coordinating entity to take.

Resolution of that question was to be accomplished during management planning and early implementation, a "startup" phase that was anticipated to provide the Commission with a sufficient length of time to achieve:

- Solid start-up with accomplishments and fully functional operations and staff;
- Strong relationships within the "partnership system" described below, especially in building relationships with other federal agencies;
- Effective operational experience; and
- General agreement on long-term structure of a local coordinating entity.

For a variety of reasons, however, startup has required more time than anticipated. At this point, the Commission would probably have less than a year to begin the first phase of implementing the management plan following its approval by the Secretary of the Interior, anticipated for the fall of 2012.

The Commission has taken an important step in considering the issue of the long-term form for the local coordinating entity. First, it has discussed establishing a parallel nonprofit organization to undertake certain administrative duties where nonprofit status provides more operational flexibility than that of a federal commission; this includes receipt of funds and donations of goods and services raised or obtained on behalf of the Commission and the awarding of small grants to heritage area partners. This organization would be intended to serve as a support structure, well away from the activism often associated with the concept of nonprofit work. Pending legal advice on the form such a nonprofit must take in New York State through the process of incorporating, establishing bylaws, and seeking state and federal nonprofit status, the board of directors of this nonprofit is expected to comprise the entire Commission and no

others. It would be what is known as a self-perpetuating board, in charge of naming its successors (bylaws would specify eligibility mirroring the Commission). The direct link between the two organizations would be established by cooperative agreement stipulating the ways in which the nonprofit is to serve the Commission.

Should the Commission cease to exist as a federal entity, this nonprofit could assume the larger role of local coordinating entity, as seamlessly as possible. It offers, in effect, a contingency plan that works to assure partners, donors and the public of the firm commitment of the coordinating entity to the long-term success of the National Heritage Area, in the face of the uncertainty surrounding the May 2013 sunset.

Establishment of this nonprofit, however, does not fully resolve the question of what the long-term coordinating entity should be. There are certain arguments for continuing the Commission with more time, perhaps making it permanent:

- Federal status grants the Commission a status held by no other nonprofit or agency serving the region's heritage (with the sole exception of the Erie Canalway National Heritage Corridor Commission, also a federal commission serving a national heritage area). It enables the building of relationships with federal agencies and tribal nations in ways that simple nonprofit status would not.
- The process of filling Commission seats through nominations by public officials and appointment by the Secretary of the Interior grants additional public status to the Commission.
- The makeup of the Commission, comprising representatives of major state, tribal, and local players in the region, is particularly beneficial to the operation of a national heritage area, which functions best when key actors collaborate effectively.
- It is appropriate that there be a federal role for one collaborator among these players, given the international border; the national, tribal, and international significance of Niagara Falls; and the significant international history of Fort Niagara.

7.3 Elements of the Niagara Falls National Heritage Area's Partnership System

This section lists critical elements of the heritage area's "partnership system." Reduced to its essence, the heritage area concept is a value-added approach to building a system out of "the parts" – those attractions, programs, and experiences that are the reasons the heritage area was established in the first place. Those responsible for these "reasons" continue to maintain and invest in them, and so their continued spending and policies contribute to the heritage area's growth and development over time. This section is designed to provide useful background and identify actions related to partners and potential supporters.

Much of the emphasis here, as elsewhere in this plan, is on building relationships and mutual regard among partners in the effort to motivate the extra support and collective action that are the "value-added" elements to be stimulated by the heritage area. It is always better to maintain relationships outside of "hat in hand" visits, where the Commission is seeking a certain action or actions from a partner or supporter. Several of the entities described here have actual power in relation to the Commission, as nominators of those who occupy Commission seats; all, however, can contribute a great deal more than this to the heritage area, if they are well-informed and included in relevant deliberations from the outset.

Key partners and the roles they play are described in Table 7-XX [which appears at the end of this manuscript]. Those partners are further described in this section.

7.3.1 Partners

As also stated above, the Commission is not, in and of itself, the heritage area. The Niagara Falls National Heritage Area is a collective effort, involving organizations and agencies represented on the Commission and others with a stake in the success of the heritage area. Partnerships, informal or formal, are critical to this success.

"Partners" as defined for this management plan are those nonprofit organizations, government agencies, businesses, and such civic groups as organizers of events celebrating local heritage, all with a direct stake in the success of the heritage area. They may be true partners, in the sense of having a relationship with the Commission through written agreement to accomplish mutually important tasks – or they may not.

This management plan expects partners to present elements of the heritage area's interpretive and other offerings individually or through collaboration, to communicate with one another and the Commission, and to embrace the plan wholeheartedly and implement it to the best of their ability. Ideally, they see the plan and Commission as enabling them to accomplish more than they can accomplish individually and they are willing to invest, make policy changes, and otherwise align their existing programs for the good of the whole.

As a first task, partners are asked to state their support for the management plan as it is submitted to the Secretary of the Interior and the Governor, and to convey commitments they expect to make in its implementation. [Note: Organizing formal statements of support by local governments and partnering organizations is a Commission activity that will take place at the same time as the plan's release for public comment.]

Partners should be as fully engaged in the work and success of the heritage area as a whole as possible. Service on Commission committees is an important way to achieve this engagement, involving individuals who represent partners. Such participants are to be recruited for Commission committees where and when appropriate.

Some heritage areas create a single standing committee for partners that undertakes a first level of review of programs, projects, grants, etc. – looking broadly across all heritage area programs. It is possible that such a "partners' committee" (broader than the Commission itself, which is already, in effect, a gathering of representatives of many partners) might evolve over time. To be able to identify the best ways to organize all committees where partners are to play a role, the Commission must first gain experience in operating programs identified in the management plan.

ACTION: Obtain letters of endorsement for this plan from Commission partners and other existing and potential partners.

ACTION: Ask non-Commissioner representatives of partners represented on the Commission and other partner representatives to serve on committees and working groups.

*****SIDEBAR: What Stimulates Successful Collaboration?

The authors of a study of the first 17 years of the Delaware & Lehigh Canal National Heritage Corridor in Pennsylvania have this to say about factors that have enhanced partnerships there: "It is essential to establish collaborative processes that enhance...the partnership system. Such processes include:

• Meaningful community engagement on an ongoing basis;

- Continually **telling the story** and **promoting the vision** in ways that connect people and communities across the Corridor;
- Responsiveness to local needs and priorities;
- Operating with an **open, inclusive, collaborative approach**... [that] involves effective listening and communication; sincerity, honesty, respect, patience, and trust; shared responsibility and transparent and flexible operations; and a willingness to try new approaches...;
- Partner organizations [that] redefine their goals and ways of working to align with the Corridor goals and vision; finally,
- A **commitment to learning and to implementing the learning** helps to hone the dynamic partnership system as it evolves and matures.

(Credit: Copping, Suzanne E., Philip B. Huffman, Daniel N. Laven, Nora J. Mitchell, and Jacquelyn L. Tuxill; Connecting Stories, Landscapes, and People: Exploring the Delaware & Lehigh National Heritage Corridor. Sustainability Study Report. A Technical Assistance Project for the Delaware & Lehigh National Heritage Corridor Commission and the Delaware & Lehigh National Heritage Corridor, Inc.; Woodstock, VT: Conservation Study Institute, 2006, p. 59; emphasis in the original, punctuation altered to create as a list; presentation courtesy Crossroads of the American Revolution Association, Inc., from its National Heritage Area management plan, 2011.)

*****END SIDEBAR

7.3.2 Marketing Role and Partnerships

The Commission's role in tourism, as described in detail in Chapter 3, Niagara's Visitor Experience, is to focus on product development, that is, on enhancing visitor experience. Its role in marketing is to ensure that visitors, once here, thoroughly understand their options and have an excellent experience that will translate to that most valuable tool of marketing, word of mouth.

Tourism marketing, in the traditional sense of spending dollars on understanding which audiences are most likely to become visitors and figuring out how best to reach them, already receives considerable spending by the Niagara Tourism and Convention Corporation (NTCC) and the Buffalo Niagara Convention and Visitors Bureau (BNCVB). The role of such organizations as NTCC and BNCVB is largely to encourage audiences to get to the regions they serve; once visitors arrive, it is up to entrepreneurs and attractions to make sure that visitors understand their specific options.

The heritage area's approach, however, is not as a single entity competing among many. Rather, it seeks to encourage the kinds of collaboration and collective enhancements that improve the chances of all to succeed in serving visitors – and doing it so well that ultimately the region is a shining example of tourism at its best. A standing committee to guide this approach will make the best use of the collective knowledge and resources available through the organizations, agencies, and businesses of the heritage area. This is in addition to the tourism projects and programs mentioned in the section above discussing Commission committees; this committee would specifically manage important relationships and projects specifically related to marketing.

ACTION: Establish a Tourism Marketing Committee.

7.3.3 Federal Role

Federal recognition provides credibility and reinforces the long-term importance of the heritage area for partners and communities.

Under the federal law establishing the Niagara Falls National Heritage Area, the Secretary of the Interior is permitted to "provide technical assistance...for the development and implementation of the management plan" and "enter into cooperative agreements with interested parties" to support the heritage area (P.L. 110-229, Title B, Sec. 424(c)(6)(A)). Generally, such assistance is provided through the National Park Service.

In addition, Sec. 427(g)(1) of the heritage area's federal legislation, in conferring authorities on the Commission, states that it may "request and accept from the head of any Federal agency, on a reimbursable or non-reimbursable basis, any personnel of the Federal agency to the Commission to assist in carrying out the duties of the Commission."

The Director of the National Park Service or his representative is named as a member of the federal Commission. This is a key role for the NPS that has brought benefits to the Commission in the form of ongoing coordination of the heritage area's funding and its relationships with other National Heritage Areas. The Commission expects to seek further assistance specifically for interpretive services, which could take a variety of forms, from short-term assistance from visiting NPS staff to address specific needs of specific projects to a ranger detailed to provide a range of services.

The Northeast Regional Office is an important guide to National Park Service resources. That office maintains a coordinator to work with heritage areas and provide liaison with the national office. The Northeast Regional Office, working with the national office as appropriate, specifically could offer:

- Regular meetings between Niagara Falls National Heritage Area and NPS regional leaders;
- Staff exchanges to help foster mutual understanding of each other's needs, skills, and opportunities; and
- Collaborative exploration of opportunities to draw on the experience of heritage area participants in addressing challenges that are increasingly important for the NPS, such as making its programs relevant to a 21st century population, connecting with audiences through many levels of education, working successfully through partnerships, achieving meaningful conservation in lived-in landscapes, and developing effective landscape-scale interpretive programs. The Director of the National Park Service recently issued a "Call to Action" with a series of challenges to the NPS and its many supporters. Exploration with the Northeast Regional Office should focus on exactly how the Niagara Falls National Heritage Area could support the "Call to Action."

There may be other federal assistance to be sought over time; the Commission should build relationships with federal agencies and their state-local counterparts, including those with economic grants or cost-share programs (USDA, HUD), Homeland Security, Army Corps, Coast Guard, etc., so that they understand the purpose and progress of the heritage area and can contribute as appropriate.

The members of the heritage area's Congressional delegation – the state's two U.S. Senators and the region's representation in the House of Representatives – are responsible for nominating Commissioners and should receive the courtesy of routine briefings. They and their staffs can be helpful in identifying sources of federal assistance.

ACTION: Request interpretive services from the National Park Service.

ACTION: Seek "details" of personnel from the National Park Service to assist with short-term projects.

ACTION: Maintain a memorandum of understanding with the NPS for assistance with Commission operations.

ACTION: Maintain NPS liaison role (as provided during management planning).

ACTION: Build relationships with agencies at the federal level whose work affects the Niagara Falls National Heritage Area or which can provide services and funding.

ACTION: Provide routine briefings to members of the New York State Congressional delegation.

7.3.4 Tribal Government Role

Tribal nations are independent, with governments that have important roles to play in relating to the federal status of the Commission. Two tribal nations, the Seneca Nation and the Tuscarora Nation, like others named in this section, are represented on the Commission. Their Commissioners can be expected to update tribal leaders routinely and to communicate their interests at Commission meetings. As an investment in goodwill and mutual understanding, the Commission should also endeavor to establish direct relationships with those leaders in a process to be mutually determined, perhaps by providing briefings at appropriate tribal meetings on a routine basis, at least yearly.

ACTION: Engage in diplomatic relations with tribal nations and consult on projects of mutual benefit.

7.3.5 State Role

Niagara Falls State Park and Other State Parks

State coordination and support is critical for implementing several elements of the management plan. This is true most especially in the case of Niagara Falls State Park and Old Fort Niagara (state-owned although operated under state license by a nonprofit partner, Old Fort Niagara Association, Inc.), Artpark (with an arrangement similar to the fort's), Joseph Davis State Park (another similar arrangement with the Town of Lewiston in collaboration with the National Audubon Society), and other parks and state properties along the Niagara River gorge. There are also state parks in Niagara and Erie counties that are thematically related to the national heritage area. The role of Niagara Falls State Park and other parks is described in Chapter 2, Niagara's Interpretive Presentation.

From a management perspective, however, one point is important to make here. Under the heritage area's federal legislation, the Governor nominates several members of the Commission. Among these is the requirement to include an individual "with knowledge and experience of the New York State Office of Parks, Recreation and Historic Preservation" (OPRHP). That "seat" is currently occupied by the senior administrator for the western region of OPRHP, who supervises the operations of Niagara Falls State Park. As terms of office run their course and vacancies occur, the Commission should endeavor to ensure that an official with such high-level responsibility and perspective always is nominated and appointed.

Other State Roles

The Secretary of the Interior is required to consult with the Governor prior to approving the management plan (Sec. 424(c)(2)). For this reason alone, the Governor's office should receive routine briefings on the heritage area's progress from this point forward.

In addition, over time, the heritage area's federal legislation requires the Governor to continue to assist the Commission by nominating individuals to the Commission. In addition, the Governor can also be helpful in expressing support for state agencies' actions to develop and maintain the heritage area, and may be amenable to coordinating agencies' contributions.

State legislators can also help to influence state agencies' support; they should also receive the courtesy of routine briefings.

ACTION: Ensure high-level representation from OPRHP on the Commission.

ACTION: Provide routine briefings to the Governor and seek help with coordination of state agencies' contributions to implementation of the management plan.

ACTION: Provide routine briefings to elected officials representing heritage area jurisdictions in the State Senate and Assembly.

ACTION: Build relationships with agencies at the state level whose work affects the Niagara Falls National Heritage Area or which can provide services and funding.

7.3.6 Local Government Role

Municipal local governments, like others named in this section, are represented on the Commission. Commissioners representing these jurisdictions can be expected to brief local elected and appointed officials as opportunities arise and to communicate their interests at Commission meetings.

This does not, however, excuse the Commission from establishing Commission-to-local-government relationships, which should include Niagara County. Providing routine briefings provided to elected officials at their regular meetings, perhaps on an annual basis, or hosting a collective meeting for a special briefing, is a courtesy and an investment in local goodwill and public visibility that goes with interaction at local government meetings.

ACTION: Provide routine briefings to local government officials.

7.3.7 Partnerships with Related Agencies

Several agencies affecting the region's heritage development are specifically represented on the Commission by stipulation in the federal legislation. In addition to the previously mentioned NTCC and OPRHP, they are:

- Niagara River Greenway Commission
- New York Power Authority (NYPA)
- USA Niagara Development Corporation (commonly called USA Niagara, it is a subsidiary of the Empire State Development Corporation, a state agency)

Each is significant in its effects on the heritage area. The Greenway and USA Niagara both are deliberate players in heritage development activities, and NYPA is a major funder for such activities.

Niagara River Greenway Commission

The Greenway's mission is "to continue and advance the state's commitment to the preservation, enhancement and development of the world-renowned scenic, natural, historic, cultural and recreational resources of the Niagara River Greenway Commission while continuing to emphasize economic development activities and remaining consistent with the tradition of municipal home rule." Its plan guides applications for grants to projects to address recreational access and other improvements along the Niagara River and its tributaries; applications are considered quarterly.

The Greenway's plan is available at http://www.niagaragreenway.org/sites/all/themes/nrgc/FINAL%20REPORT.pdf

USA Niagara

USA Niagara works to improve a defined "Niagara Development District" within the City of Niagara Falls next to Niagara Falls State Park. It "is solely dedicated to the support and promotion of economic development initiatives in Niagara Falls by leveraging private investment and encouraging growth and renewal of the tourism industry in the City of Niagara Falls." (http://www.usaniagara.com/about_us.asp) It makes significant public investment available within its district and acts directly to support development projects in its plan, following established urban design standards; its website lists a dozen capital investment projects in which it is or has http://www.usaniagara.com/projects.asp, including multiple projects along Old Falls Street (the city's "gateway" to Niagara Falls State Park) and the Third Street Entertainment District. USA Niagara's plan is available at http://www.usaniagara.com/dev_strategy.asp.

New York Power Authority

NYPA is a major landowner in the gorge and its operation of the major hydroelectric power system on the U.S. side of the river affects the river's flow. More than \$1 billion in financial support and other benefits have been forthcoming for Western New York under NYPA's re-licensing, for 50 years following September 1, 2007, under an alternative relicensing procedure of the Federal Energy Regulatory Commission (FERC). [This statement and the following discussion are based on a press release dated 9/6/07 and found at http://www.nypa.gov/press/2007/070906a.htm, accessed 12/28/11.] That procedure drew extensive participation by more than 100 stakeholders in the area – state and federal resource agencies, local municipalities, customers, and environmental groups – and led to six settlement agreements including financial commitments for capital projects, infrastructure, economic development, the environment, recreational facilities, and various other enhancements, all of which have strengthened the qualities of the National Heritage Area (see sidebar).

*****SIDEBAR: NYPA's Support Has Strengthened Qualities of the National Heritage Area

Benefits to Western New York communities and projects materialized even before the start of NYPA's 2007 license, with December 2005 payments of \$8 million and \$5 million, respectively, to the Niagara Power Coalition, comprising the seven host communities within the project's boundaries, and to the Tuscarora Nation. A 2006 settlement agreement included funding for the Niagara River Greenway, for which NYPA will provide a total of \$9 million a year for greenway development in Erie and Niagara counties; \$3 million of this benefits Niagara Falls State Park and other state parks within the Niagara River Greenway. Other benefits of the relicensing process affecting the heritage area include:

- Provision of hydropower to the host communities, the Tuscarora Nation, and Niagara University (the latter two are adjacent to the project), expected to provide hundreds of millions of dollars in savings for those entities over the 50-year term of the new license.
- Creation of a \$12 million fund for construction of eight Habitat Improvement Projects (HIPs) at
 designated areas outside the Niagara project's boundaries, to protect fish and wildlife within the
 Niagara River basin. Another \$1 million is available annually for additional HIPs, to be identified
 by an Ecological Standing Committee composed of representatives of key local and state
 organizations.
- NYPA capital improvements to enhance public access to the river in the area of the project, including additional parking for anglers and others, at a cost of nearly \$6 million, including (1) Upper Mountain Trail and Parking Lot development; (2) Robert Moses Fishing Pier Parking enhancements; and (3) Upper Niagara Intake Structure site improvements.

• Improvements to recreational facilities operated by the OPRHP within or in the vicinity of the project boundary supported by a fund of nearly \$9.3 million established for this purpose, which OPRHP has devoted to (1) Reservoir State Park; (2) Niagara River Gorge trails; and (3) Earl W. Brydges State Park (Artpark).

*****END SIDEBAR

Other Economic Development Agencies

Other economic development agencies besides USA Niagara are also important players in the region, including the recently formed Western New York Regional Economic Development Council (WNYREDC). This agency guided \$100.3 million to 96 economic development projects out of \$785 million awarded by Governor Cuomo in December 2011. Recognized as the best plan submitted from among all regional councils competing for the funds, the council's plan included a focus on attracting more visitors and identified tourism as one of eight industry sectors strategic to the region's growth. It made several key points about tourism that are discussed in Chapter 3, Niagara's Visitor Experience (http://governor.ny.gov/press/12082011RegionalCouncils, accessed 12/28/11) The WNYREDC is intended to coordinate the state's involvement in the economic development of Erie, and Niagara counties, along with similar efforts in Allegany, Cattaraugus, and Chautauqua counties; for more information, see http://www.governor.ny.gov/press/ 07262011DevelopmentCouncil and http://nyworks.ny.gov/content/western-new-york.

Niagara County's work in economic development is coordinated through the Niagara County Center for Economic Development (http://www.nccedev.com/content/about-niagara-county-center-economic-development).

Niagara Falls Bridge Commission

Another major partner, potentially, is the Niagara Falls Bridge Commission, a unique international agency established in 1938 by both the U.S. and Canada to finance, construct and operate the Rainbow Bridge. It now also operates the Whirlpool Rapids (Lower) and Lewiston-Queenston bridges and maintains facilities for customs and immigration functions on both sides of the border. The NFBC is self-supporting, largely through user fees (tolls) and private-sector tenant leases. Canada and the U.S. are equally represented on the NFBC by an eight-member Board of Commissioners, appointed by the Premier of the Province of Ontario and the Governor of the State of New York, respectively.

As the Commission's website states, Niagara Falls "beckons visitors from around the globe. But it is the bridges that actually bring most of them here. No other single factor contributes more to tourism growth – indeed the export trade economy overall – than the NFBC's three monumental linkages of concrete and steel. Niagara Falls crossings rank second only to Kennedy International as the busiest port of entry between the U.S. and Canada.... Trade traversing the U.S.-Canada border exceeds \$1-billion per day. Niagara Falls crossings ring up \$26-billion per year. That's \$3-million rolling over the borders every hour. More than 500,000 U.S. and Canadian jobs depend on export traffic traveling across NFBC connectors."

In its Community Request Policy, the Commission states that it "has always interpreted its mandate to the maximum benefit of the community with respect to paying voluntary local taxes and supporting community organizations," and defines its mission as supporting "cross border relations, tourism and international commerce through the efficient movement of people and goods over its Niagara River crossings." It awards grants, generally twice a year, only to "public organizations operating for the benefit of the border communities," including nonprofit community-based organizations. Criteria include programs, projects, and activities that benefit the NFBC and are consistent with its mission; benefit to the

bi-national border community; and NFBC benefit from association with the grantee. The community request policy and application form may be found at http://niagarafallsbridges.com/ comrequest.pdf.

Niagara Frontier Transportation Authority

Another major partner, potentially, is the Niagara Frontier Transportation Authority (NFTA). The role of this organization pertains to transportation challenges to be addressed by the Commission in concert with other regional players, as discussed in Chapter 3, Niagara's Visitor Experience.

Institutions of Higher Learning

Institutions of higher learning in or near the National Heritage Area are or could be significant partners. These include Buffalo State University, Niagara County Community College, and Niagara University, all of which have faculty serving as Commissioners; and the University at Buffalo. UB's urban and regional planning program has long been a leader for regional studies that have examined important issues in the U.S.-Canadian region surrounding Niagara Falls, including significant public participation.

The Commission will build relationships over time with all of these through projects. Existing efforts offer clues to how projects might help the Commission build relationships and how these institutions might achieve objectives of this management plan. For example, a key heritage development project in downtown Niagara Falls (also supported by USA Niagara and WNYREDC), is now underway, renovation of nearly 90,000 square feet of the former Rainbow Centre in Niagara Falls by Niagara County Community College. The facility will be a Hospitality and Tourism Center, to include the Culinary Institute of Niagara Falls.

As another example, Niagara University is currently studying the possibility of establishing a permanent presence in downtown Niagara Falls for its College of Hospitality and Tourism Management, assessing potential economic development impact, tourism development opportunities, and the existing program's needs. As described in a recent newsletter of USA Niagara – which has funded NU's study – "the College is a founding member of the Leading Hotel Schools of the World and is recognized globally within the industry, ranking in the top 20 hospitality and tourism programs in the country. Building upon the benefits of Niagara County Community College's soon-to-be-completed Niagara Falls Culinary Institute, an NU presence could potentially add hundreds of additional students to the downtown landscape. Well-trained graduates of these institutions will be members of the future hospitality work-force, as well as investors, entrepreneurs and hoteliers." (Source: http://www.usaniagara.com/pdfs/Newsletters/E-Bulletin2011Vol1compressed.pdf) Related to this is another idea for NU, not as far along and described in section 7.7.2, a Heritage Tourism Institute.

ACTION: Build a relationship with the Niagara River Greenway Commission.

ACTION: Build relationships with USA Niagara and other economic development agencies whose work affects the Niagara Falls National Heritage Area or which can provide services and funding.

ACTION: Build a relationship with the New York Power Authority.

ACTION: Build a relationship with the Niagara Falls Bridge Commission.

ACTION: Build a relationship with the Niagara Frontier Transportation Authority.

ACTION: Build relationships with institutions of higher learning in or serving the National Heritage Area which can provide services and funding.

7.3.8 The Need for an Organization of "Friends"

Recent discussion among Niagara Falls National Heritage Area Commissioners has addressed the potential of creating a "friends group" that would be open to membership by both residents and visitors. Residents would have a rallying point to show their support and would form a pool of local volunteers for the Commission and National Heritage Area programs benefiting a wide variety of partners. Visitors would view joining such an organization as a way of expressing their gratitude for their experience and making a lasting contribution of "friendship" to help preserve the marvelous resources of the heritage area. Such an organization would enable the Commission to identify its natural constituency and to reach out to potential volunteers. The Commission's parallel nonprofit could use this constituency and pool of volunteers to begin the most basic of tasks in creating long-term support from major donors, building lasting relationships with those most interested in the organization's mission.

An organization serving such "friends" would make sure that its constituents know the National Heritage Area from the inside, would communicate events and other offerings to residents and visitors via various media (e-newsletter, Twitter, etc.), and could offer "members-only, behind-the-scenes" kinds of tours or events. It could also enlist members' support when needed by the National Heritage Area – for example, in encouraging outreach to public officials whose support is needed by the Commission for projects and funding.

There are a few drawbacks to such an organization to weigh against these benefits – all of which can be ameliorated, with work. First, and twofold, establishing and maintaining such an organization would claim the energies of both Commission and staff; and such organizations rarely pay for themselves in funds taken in versus expenses. Even maintaining a friends group via a Facebook page, a first step recommended here and in Chapter 3, Niagara's Visitor Experience, can require considerable staff attention. "Costs versus benefits," of course, is a different calculation. The reason to establish such organizations is less about raising funds – despite the prospect of identifying major donors over time as mentioned above – and more about "raising friends." The bottom line for this point: a "friends group" can be a formidable communications vehicle – but at a cost.

Second, people and organizations induced to "join" such organizations expect benefits, even if this is simply an expectation of regular updates and communications and fresh ideas appearing on the Facebook page. These, too, come at a cost, and moreover, the demand never ends. Once the expectation is there, it must be met, routinely and often enough to keep members interested and re-joining. Establishing a Facebook page that does more than direct visitors to the Commission's primary web site is a large responsibility.

ACTION: Create a presence on Facebook to brand and build interest in the National Heritage Area and identify a following. [Related to CH3 ACTION: Take advantage of trends in social media, creating a presence on Facebook, Twitter, Flickr, Yelp, and other appropriate social media applications.

ACTION: Evaluate the use of Facebook's feature allowing "fans" to self-identify as a first step or element of support in developing a following of "friends" of the National Heritage Area. [same action as stated in Chapter 3, Niagara's Visitor Experience]

7.3.9 Thinking Regionally

The Commission's primary goal related to this chapter includes an aspiration for regional leadership:

• Heritage Area Management and Regional Positioning – Work to extend the communication, coordination, and cooperation among governments, communities, and organizations that are essential to regional success in heritage tourism.

This is a natural tendency, given the regional nature of some of the organizations represented on the Commission, and the fact that the Commission itself is coordinating a regional entity, the heritage area. To compound this tendency toward thinking and acting regionally, the Commission has a responsibility to bring thematically related interpretive sites into the fold (see Chapter 2, Niagara's Interpretive Experience, for more on this point).

To exert regional leadership takes energy. The Commission must focus on building individual relationships among the partners described in Section 7.3 as a whole, but as it does so, there will be opportunities to bring those partners together. Where such gathering of forces can help the heritage area make progress in implementing the management plan and share resources without diluting them, this can be considered a useful activity, supporting basic relationship-building. The same is true of participation in regional activities led by others – there is justification for the time and energy this takes where it will help to solidify relationships with organizations and agencies that can help the heritage area.

Aside from building ties among partners and supporters, however, the Commission has a real opportunity to offer the region leadership in two particular ways: first, in heritage tourism, and second in historic preservation.

The Tourism Marketing Committee described in section 7.3.2 is the vehicle through which the Commission can provide leadership in heritage tourism.

As for historic preservation, Chapter 6, Preservation, Conservation, and Stewardship, calls for planning and training activities to support heightened preservation awareness and action in Niagara Falls, Lewiston, and Youngstown. As the Commission organizes these activities, it is possible to invite others from Niagara County. Their participation is likely to add to the general experience of sharing information and examining local situations for problem-solving exercises. The Commission can also organize these activities in concert with another regional player, Preservation Buffalo Niagara, which serves seven counties in Western New York.

7.4 "Partner Development"

Section 7.6 notes why "fundraising" is now often called "resource development" – because successful fundraising proceeds from developing relationships with sources (resources) for those funds.

In the same sense, "partnering" should be regarded as developing relationships, for the benefit of both parties – hence the title of this section addressing how to shape heritage area programs for partners is "partner development." Every action the Commission, staff, and partners undertake on behalf of the Niagara Falls National Heritage Area can be regarded as an opportunity for enhancing partners' abilities to contribute to the collective benefit of the heritage area. (Just as every action is also an opportunity for communicating heritage area messages, and for developing relationships that will support successful fundraising, both points hammered home in sections below.)

The Commission has great potential for assisting and lending credibility to the goals and endeavors of partners. Emphasizing working relationships among partners is an important means of building the heritage area and accomplishing its goals in a mutually beneficial way.

The idea of partner development goes far beyond the usual hope of heritage areas' partners for grants. Yes, grants can be a part of partner development, depending on the extent to which the Commission

decides grants can further the goals of this management plan, versus spending funds directly on technical assistance to partners or other programs where the Commission must spend its funding directly in order to be successful. Here are many other ideas to be considered in developing a complete program for partner development:

- Technical assistance for planning
- Technical assistance for program and product development
- Technical assistance for fundraising and grant writing (especially writing grant applications for heritage area funding)
- Matchmaking/committees & projects
- Networking/gatherings
- Training programs and workshops
- Quality control programs that let partners promote their achievements
- Best practices/technology transfer/skill-sharing
- Recognition programs ("best of," "most improved," etc.)
- Coalitions and joint ventures
- Endorsement of partners' grants to others
- Sponsorship of "expos" for funders to meet partners, or for partners to share information with one another and the resident public
- Docent and volunteer recruitment and training
- "Grants" that are awards of technical assistance, rather than dollars

The Commission's intent is to share some of its federal funding with partners in the form of matching grants. As noted in the above list, however, monetary matching grants are only one way to build partners' capacity; for example, in some cases, it may be useful to ask partners to compete for consulting assistance to be arranged by the Commission, also requiring the applicant to bring a match to the table. Current policy of the Commission, developed in the early-action awarding of monetary grants for War of 1812 activities, is to require a three-to-one match.

Design of a grant program for the first phase of plan implementation is a high-priority activity that requires consideration of matching requirements, size limitations, and topical focus – activities that maximize a given emphasis in implementing management plan goals, year to year (see strategic planning, below). Allocation of funds to such grants will depend on the Commission's sense of how much of its budget it will devote to initiating its own programs versus supporting those of partners, and what programs within partner development it is most useful to emphasize. The Commission may choose in some years to devote its grant funding to one or more specific projects of highest priority for implementing the plan.

ACTION: Recognize that many Commission actions and programs encompass elements of a partner development program; craft and budget for a full program and communicate it to partners accordingly.

ACTION: Reserve a portion of the Commission's federal heritage area funding for small monetary grants that will build partners' capacity.

7.5 Communications

The Commission's role in communications is a large one. It must build the heritage area's identity and visibility among multiple audiences, both residents and visitors, creating a lasting presence. It must enable communication with and among partners – committees described above can be a major tool for this, along

with other meetings or events designed to bring partners together. It must use up-to-the-minute technological advances, particularly to serve travelers; the Commission's website is a critical part of any set of communication strategies and can serve as a platform to support other technologies. Success in communications will enable long-term success in developing funding relationships and resources.

Just about everything – every program, every action – undertaken by the Commission has a communications angle. Just as the Commission is to cultivate its awareness for opportunities for developing relationships at every turn in order to support resource development (described in the following section), it will look for ways to maximize its visibility and its messages.

Branding and messaging – discussed in Chapter 3, Niagara's Visitor Experience, section 3.3 – is one part of organizing communications, and extends across all audiences. It is a critical element of building visitor awareness, and supports marketing plans that affect the heritage area. Communications planning is broader, encompassing how the Commission will communicate with partners and residents as well as visitors and potential visitor markets.

A communications plan should be a part of every annual work plan (described further below). It should address the following:

- (1) Desired outcomes for communications by the Commission in its own right and on behalf of the heritage area
- (2) Background
 - A. Audiences e.g., visitors, volunteers, residents of particular communities, businesses, local and state government officials (elected or otherwise), state and federal legislators, grantors, donors, and partner organizations.
 - B. A simple listing of strengths, weaknesses, opportunities, and threats (the traditional "SWOT" employed by planners of all kinds), used to assess the organization's progress in implementing the plan through communications, and its performance in communications the previous year.
 - C. Upcoming communications opportunities both internal to the Commission's programs (e.g., training workshops) and external (partners' events)
- (3) Messages (specific to each audience identified, following from primary messaging strategies developed for the Commission's branding program; and from desired outcomes identified for this plan)
- (4) Activities
 - A. Website
 - B. Social media and evolving digital technologies; email communications
 - C. Print media (e.g., brochures, annual report, newsletters, event promotional material such as invitations)
 - D. Promotions (e.g., advertising, exhibits for meeting display, special banners)
 - E. Events sponsored by the Commission (e.g., workshops)
 - F. Media outreach (not an audience per se, but rather a means of reaching audiences, using, e.g., media releases, familiarization tours, press conferences for especially important moments, invitations to cover events, etc.)
 - G. Annual report
 - H. Materials to support the development plan

- (5) Accomplishing activities for each activity, express:
 - A. Calendar: timing and synchronization considerations
 - B. Resources needed (staff time, funds, volunteers, Commission attention, etc.)
 - C. Measurements for evaluating performance (e.g., increases in visits to the website, increases in donations from residents; rate of use of social media; participation at events; media coverage, etc.).

One particular activity to create "esprit de corps" among heritage area partners would be to hold an annual special event to review progress on the management plan and upcoming activities. This could include reports from Commission committees, an opportunity for partners to report to the Commission on their individual progress in contributing to the heritage area's development, and an awards program to recognize meritorious individuals and programs. The entire event should be regarded as a premier opportunity to communicate the purpose and vision for the Niagara Falls National Heritage Area.

ACTION: Create an annual communications plan within the Commission's annual work plan, coordinating with communications associated with interpretation, heritage tourism marketing, and fundraising and piggybacking on Commission activities that can be regarded as having a communications dimension.

ACTION: Make permanent the current committee formed to advise the Commission on planning and executing communications and public outreach during management planning.

ACTION: Hold regular gatherings of partners to review progress on the management plan.

ACTION: Create an awards program to recognize meritorious individuals and programs.

7.6 Resource Development

Successful fundraising relies on excellent development of relationships with funders and donors, existing and potential, along with grant writing. This emphasis on development of relationships is the reason why the preferred term for fundraising in recent years has become "resource development." This section of the plan will suggest objectives and strategies specifically associated with the development of relationships for ongoing support. It will address a special concern for heritage areas, potential competition with partners, to be addressed by collaborating and communicating fundraising strategies with partners.

7.6.1 Funds Available

Heritage areas expect to receive federal support once their management plans are complete. Programs supported under agreement with the federal program must be paid for up front, with the funds spent being reimbursed under National Park Service procedures. Federal funding is by no means assured, nor should or will it be assumed it will comprise the bulk of the Commission's budget.

Funds so provided to the Commission must be matched dollar for dollar, with the Commission's share of the match allowed to include "in-kind contributions of goods or services fairly valued" (P.L. 110-229, Title B, Sec. 409(c)). If partners receive federal funds via the Commission, they can be expected to provide a portion of the match required of the Commission, perhaps more than the 50-50 required of the Commission (Sec. 409(c)). Already, in one Commission early action, grantees receiving support for activities commemorating the War of 1812 were required to match federal dollars 3:1, not 1:1. This "overmatch" can be counted toward the Commission's 1:1 obligation, supporting activities that may not so readily find matching support (typically such overhead items as office space).

The funding available from federal heritage area allocations will never be enough to accomplish the work laid out in this management plan. It should be regarded as seed funding – a part of the status of the Commission that makes it a desirable funding partner, because those who might confer additional funding on the Commission will understand it as readily matching funds. Thus, the Commission has a large job ahead: to raise the necessary funds to achieve the vision for the Niagara Falls National Heritage Area. Fortunately, it is not alone. Partners, as well, are already spending funds on behalf of projects that will enhance the heritage area's capabilities and experience.

7.6.2 Organizing for Resource Development

A business plan includes a financial plan. A nonprofit organization like the Commission has a fundamentally different task from profit-making enterprises, where customers provide the support for the enterprise by purchasing its products and services. A successful enterprise attracts a sufficient customer based not only to sustain the entire enterprise, but also to reward investors whose dollars provide startup costs and additional investments as the business grows. For the Commission, one kind of "customer" will be donors and granting agencies or institutions who perceive value in providing the necessary dollars for the Commission to do its work ("run its business"). In fact, a financial plan for a nonprofit must emphasize resource development – that is, identifying and building relationships with those who offer funds.

The task of identifying and going after the necessary funds to achieve the goals and strategies in this management plan is the job of every Commissioner – indeed, of every partner with a stake in the success of the heritage area. One mistake many nonprofit executive bodies make is to relegate the resource development function to a committee, and then worse, not attend to that committee's operation with the routine inclusion of resource development on the general agenda.

Organizing for resource development starts with an agenda (the Commission's) and people. Organizations that conceive of fundraising as "the job of the fundraising committee" rarely succeed – it is a team effort that should engage everyone involved in the organization's endeavors. Ideally, the Commission will have a resource development leadership team comprising the following:

- The Commission Chairperson, in tandem with the Executive Committee;
- A Resource Development Committee;
- A fully engaged Commission, with time on its agendas to address resource development, willingness to learn about the resource development process, and the ability to participate in calls on potential grantors and donors;
- A staff director (executive director);
- A resource development specialist (under contract or on staff);
- A communications staff or contractor fully on board with the idea of combining communications with resource development; and
- An administrative staff to support administration of incoming grants.

A basic ingredient in organizing is a strategic plan specifically for resource development. This plan is a record of decisions and direction based on research (what's possible?), analysis of strategies (how, in general, will we seek funds? Which audiences, which projects to emphasize?), and establishment of objectives (whose funds and how much will we seek?). The strategic resource development plan ideally would cover a three-year timeline, to be reviewed and updated annually. It provides guidance for the resource development activities to be detailed in the Commission's annual work plan, as described in section 7.8.2.

An experienced fundraising professional can advise the Commission in creating this plan, and can assist in carrying it out if planning reveals the desirability of such added horsepower. There are also many good how-to resources available through websites and books.

Finally, an important factor in success will be attitude – on the part of all involved in the Commission and heritage area. Gaining financial and other support should always be a factor in operating the Commission and designing the heritage area's programs. The Commission must be entrepreneurial, with everyone ready to pitch in where needed; there should be no one anywhere who does not see raising funds as a part of his or her job, with everyone watching for opportunities. Heritage area partners should be encouraged to understand the Commission's needs in meeting its responsibility to raise support for the entire heritage area, and to regard that challenge as their own, as partners with a stake in the heritage area's success.

ACTION: Establish and maintain a three-year strategic plan for resource development.

*****SIDEBAR: A Checklist for Ways to Raise Funds

- Grant applications and requests for funding (or sponsorship) to
 - Foundations
 - Government agencies
 - Corporations
- Mid-year solicitation for an "annual fund" (unrestricted dollars to support the organization in general)
- An annual campaign for "end-of-year gifts (also generally understood by donors to be unrestricted)
- A program to solicit major donors;
- A campaign for a specific need, project, or program (restricted funding);
- Events and other "grassroots" fundraising opportunities at the community level (the familiar high school carwash, for example) sometimes called "friend-raising" since such programs are better budgeted for raising enough funding to cover their costs, rather than as a significant source of cash;
- Endowment and capital campaigns to build long-range resources;
- Cooperative fundraising activities with partners;
- Fee-for-service activities (charging for technical assistance to partners; or hiring out staff experts beyond the heritage area); and
- Enterprise activities.

*****END SIDEBAR

7.7 Operations and Staffing

7.7.1 Getting the Work Done – Staffing and Support

The Commission requires staffing and support to get its work done day to day. It is assumed that staffing growth will occur gradually from the current status quo, currently one part-time staff person serving as project director and providing logistical support for Commission meetings and committees. There are a wide range of skills required by a successful heritage area and not all will be fulfilled by staff. Alternatives to hiring staff include contracting with consultants, recruiting volunteers, delegating to Commission committees, or asking partners to share the load – or a creative combination of many of these for any given need. The programmatic recommendations provided in other chapters and the experience of other heritage areas suggest that the following functions are needed to be fulfilled by arrangements as the

Commission decides – it is not possible to predict just how staffing and support should emerge, only that the following skills or roles should be on the menu as the Commission seeks assistance:

Administration:

- One person with an understanding of all aspects of the organization's role (an executive director
 is typically responsible to the board for such work, but coordination without executive
 responsibility is also possible given greater chairperson and executive committee involvement);
- Office administration, including support for information technology;
- Contract management;
- Communications, data management (web site, e-newsletter, database of contacts, etc., annual report, meeting management);
- Support for Commission and committee meetings;
- Strategic and work planning; and
- Public relations.

Finance:

- Financial administration (bookkeeping, reports, financial reviews);
- Resource development (fundraising) planning and execution, including grant writing;
- Supervision of incoming and outgoing grants that support the Commission's work, including the necessary reports to funders;
- Supervision of small grants given by the Commission to heritage area partners; and
- Contract management support.

Mission:

A wide range of skills, knowledge, and experience is needed to implement the programs described in the preceding chapters of this plan:

- Chapter 2, Niagara's Interpretive Presentation: research, history, interpretation;
- Chapter 3, Niagara's Visitor Experience: tourism, branding, marketing, wayfinding transportation;
- Chapter 4, Community Engagement: education for students and adults; public outreach, including use of the arts and events;
- Chapter 5, Community Revitalization: community planning, interpretation, trail development; and
- Chapter 6, Stewardship: historic preservation, conservation.

These all involve projects that the Commission might undertake directly or that the Commission will encourage others to undertake; for example, the element of partner outreach makes interpersonal and organizing skills as important as, say, skills relating to interpretation. Experience in the following could also be useful:

- Training;
- Public outreach;
- Facilitation (of meetings);
- Capital projects; and
- Project planning and management.

The generic functions described here can be combined and tailored to the skills and interests of the individuals who are hired to fulfill these functions – for example, an executive director may have an

interest in historic preservation or community planning and be able to cover community revitalization issues, an administrative aide may be an expert meeting manager, or a public relations person may have a tourism background.

It should be noted that staff costs are emphatically not "overhead" costs in the sense of the "management and general" category for expenses required for reporting under the IRS Form 990 (the nonprofit organization's "tax return" – which technically does not apply to a federal commission but which provides a useful basis for discussion). Rather, staff costs (and expenses relating to support for staffing, such as mileage reimbursements) will be allocated as appropriate to programs that benefit from staff time. Many important programs can be achieved completely through staff; others, like workshops, require funding for such things as educational materials, in addition to the funds required to cover associated staff costs. (In that example, of course, some of the costs can be covered through charging fees to participants.)

Interpretive services in particular could be provided in the form of an interpretive ranger at no or reduced cost by the NPS (see Sec. 424(c)(6)(A), which allows the Secretary of the Interior to "provide technical assistance under the authority of this subtitle for the development and implementation of the management plan." This idea has precedent in several heritage areas, including the John H. Chafee Blackstone River Valley National Heritage Area in Massachusetts and Rhode Island, the Erie Canalway National Heritage Corridor, both currently, and the Delaware & Lehigh Canal National Heritage Corridor in eastern Pennsylvania in its early years. Even if a full- or part-time NPS staffer is not made available, the National Park Service can provide staff on temporary detail to focus on various projects where short-term assistance would be helpful.

Tourism services could be provided through a contract with the proposed Heritage Tourism Institute of Niagara University (NU). The concept for the "HTI" – which is only under informal consideration by university officials as this is written – is loosely modeled on another relationship between a heritage area and an institution of higher learning in New York, that is, a partnership between the Hudson River Valley National Heritage Area and Marist College's Hudson River Valley Institute (HRVI) in Poughkeepsie. The institute is an independent entity under contract to the Hudson River Valley Greenway, the heritage area's management entity, and has undertaken defined tasks and programs for the heritage area along with programs of its own initiative. HTI would be an expanded program aiding NU in managing its many existing community outreach programs that affect tourism and heritage development in the region. It could also be the home and repository for the cultural resource database and virtual archives described in general in Chapter 4, Community Engagement, sections 4.5.1 and 4.5.2, and in Chapter 5, Preservation, Conservation & Resource Stewardship, sections 5.4.5 and 5.4.6.

The projected minimum budget for the Commission would be approximately \$500,000 for a fully developed staff and program, which may take several years to achieve at a stable, sustainable level. This estimate covers both staffing and staffing-related operational costs (e.g., travel, office costs), roughly 50 percent of a budget of any size; and programmatic costs related and unrelated to staffing (e.g., website or publication costs), which would be the other 50 percent. This 50-50 rule of thumb may vary from year to year according to budget size and program choices, but it provides a starting point for evaluating and proposing annual budgets. The \$500,000 estimate is on par with or slightly less than the budgets of older heritage areas and is not meant to bind the Commission to any particular size of budget.

ACTION: Establish a three-year plan for the addition of staffing resources.

ACTION: Establish regular personnel and hiring/contracting procedures, including plans for staff training.

7.7.2 Financial Management

Although the Commission is a federal entity and its spending is therefore tracked through official federal systems (managed for the Commission by the National Park Service), the Commission should establish its own financial management system that mirrors the required federal tracking through the proposed nonprofit partner. This partner's financial system should be designed to enable making real-time accounting information readily available to the Commission and staff, and the generation of financial data for planning, resource development (fundraising), and reports to funders (including the NPS) and the public.

Transparency is the general rule for a body such as the Commission; an annual report is a critical element of the communications plan described in section 7.5. The establishment of the nonprofit organization/foundation described above makes it incumbent on the Commission to keep careful accounts on behalf of both organizations, and understand the financial roles and responsibilities of both.

For both the Commission and its nonprofit, the Commission should or will establish an annual budget for each (over time, of course, based on historical financial data and resource development experience that enable fairly accurate projections of income and expenses). It would then examine the budget statements and balance sheets regularly, closely following the organization's progress in meeting its budget and managing such obligations as accounts payable and restricted funds, which are recorded in the balance sheet. Accounting software that allows an at-a-glance understanding of the budget compared to actual spending is important to use. Sometimes the rate of spending, rather than whether the organization is over or under budget in a certain line, is helpful information to keep programs on target.

A finance committee should or will be tasked with examining the finances thoroughly prior to Commission meetings and explaining key points to the full Commission. The committee would also be responsible for overseeing annual financial reviews and providing a financial statement for the annual report.

A good financial management system for a nonprofit organization should or will accomplish the following, at a minimum: (1) track a "chart of accounts" – typical of profit-and-loss budget statements usually reviewed by boards at each of their meetings – in sufficient detail to support annual financial reviews and reporting on the IRS Form 990¹; (2) enable full knowledge of the actual cost of programs, by allocating portions of costs tracked in the chart of accounts and aggregating them²; and (3) enable automated financial reporting specific to grants given to the organization by multiple sources.³ Using such a system requires careful administration and a commitment to accuracy.

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¹ Generally Accepted Accounting Principles (GAAP) refers to the standards that accountants follow in the preparation of financial statements. See Wikipedia for a starting explanation. For a suggested listing of costs tracked by most nonprofit organizations, see http://nccs.urban.org/projects/ucoa.cfm, which provides templates for the Uniform Chart of Accounts published by the National Center for Charitable Statistics (NCCS). GAAP and NCCS charts of accounts differ slightly; the NYS CDP follows GAAP and the IRS Form 990 is somewhat open-ended, prescribing only a few accounts that would be part of a complete chart of accounts.

² This is not something easily seen at a glance by examining a chart of accounts, where every expense is typically coded and tracked in a standardized way. For example, a website might require staff time, a contractor, and an annual payment for the domain name, each of which would appear on separate lines in a chart of accounts. In Quickbooks, a popular bookkeeping program, understanding program costs is accomplished through using a second code for expenses to sort them into "classes," customizable to the organization's needs. (Customized classes in turn can be organized and aggregated to conform to the IRS 990's three primary expense categories, program service, management and general, and fundraising (Part IX, columns B, C, D).)

³ Again, this is not something easily seen through a glance at either the chart of accounts or a system that aggregates costs by program. The Quickbooks program allows a third coding system, used congruently with the other two described in these

ACTION: Establish a computerized financial management system that generates sufficient financial data for planning, resource development (fundraising) and administration, and reports to funders and the public.

ACTION: Establish regular financial procedures to support the Commission's fiduciary responsibilities, including an annual budget and regular reviews of progress in meeting the budget.

7.8 Strategic Planning and Implementation

In general, this entire management plan is considered a long-range plan, describing much of what the Commission and those with a stake in the success of the heritage area expect to see develop over the course of ten years. The text in each section provides fairly detailed guidance in many instances, but the actions are stated in general terms, providing flexibility for on-the-ground, year-to-year program decisions. A strategic plan is a short-range plan, setting priorities and emphasizing those things most important to do more or less immediately; it, too, may have little detail. A well-maintained strategic plan is updated annually so that it always provides a time horizon of approximately three years; done this frequently and with solid, timely preparation, it should not require a great deal of time. An annual work session involving Commission and staff working together to address such planning can be sufficient; it also provides in-depth understandings that may or may not be documented in the strategic plan itself. The strategic plan guides annual work plans tied to budget and staff objectives, where program details are documented.

7.8.1 Overview: Critical Areas for Focus

High-priority activities will include activities (1) for which no other organizations are directly responsible, and (2) that encourage communities, sites, and partners to take collective action to support the heritage area and take individual advantage of its benefits:

- Building the interpretive system;
- Improving the visitor experience, including quality control, hospitality, and insuring that visitors can access interpretive offerings and recreational opportunities throughout the heritage area:
- Improving visitors' opportunities for moving about the heritage area "from the Falls to the Fort" including completing a network of trails for residents and visitors to enjoy the gorge and working to assure maximum multi-modal transport opportunities;
- Encouraging existing marketing organizations to collaborate in reaching audiences that will embrace the heritage area experience;
- Encouraging communities to take maximum advantage of heritage area investment opportunities that support community revitalization and stewardship; and
- Supporting certain operational needs, especially fundraising and communications.

7.8.2 The Importance of Annual Work Plans

Section 7.7.2 emphasizes responsible financial management in several practical ways, including establishing an annual budget that will allow for comparison of income and expenses to budget estimate.

footnotes, called "Customer: Job." The funder is simply a customer (this makes a certain kind of sense – the funder is "buying" the nonprofit's services or programs), and each grant from that customer/funder is a "job." Spending for grants to these funders can be sorted and reported without analysts having to comb through unrelated expenses.

Just as important, however, is a detailed plan for how to spend these resources, in the form of the Commission's work plan describing its annual workload and intended results. The work plan should be tied to staff (and contractor) time and work objectives (used for year-end evaluations of staff performance) for a realistic picture of what is possible to accomplish with given staffing resources. An excellent system to support work planning is in place at the Erie Canalway National Heritage Corridor.

ACTION: Undertake three-year strategic planning on an annual basis in support of annual work planning.

ACTION: Establish an annual work plan in concordance with an annual budget.

7.9 Evaluation

The Commission tracks and celebrates the heritage area's progress – to be measured in more ways than spending. Such intangibles as level of cooperation among partners and visitor satisfaction may also yield to measurement. The Commission is the "keeper of the flame," the organization that communicates the vision for the heritage area. It must monitor implementation of the plan that is designed to help the region achieve that vision and organize adjustments as circumstances and opportunities change.

7.9.1 Federal Evaluation in 2020

The Commission and the Niagara Falls National Heritage Area will undergo a major, independent evaluation by the National Park Service in 2020 (see sidebar). Current thinking on the part of the national program offers these questions as the basis for the evaluation:

- Based on its authorizing legislation and general management plan, has the heritage area achieved its proposed accomplishments?
- What have been the impacts of investments made by federal, state, tribal, and local government and private entities?
- How do the heritage area's management structure, partnership relationships, and current funding contribute to its sustainability?

The evaluation design employed in the first, experimental reviews for older heritage areas has also included these topics:

- Overarching goals for the National Heritage Area
- Resources and key partnerships available to help the National Heritage Area accomplish its goals;
- Activities and strategies that are being implemented to accomplish the goals;
- Intended short and long term outcomes; and
- The linkages among the activities, strategies, and outcomes.

*****SIDEBAR: NFNHA's Evaluation Requirement in P.L. 110-229

- (a) IN GENERAL.—Not later than 3 years before the date on which authority for Federal funding terminates for the National Heritage Area under this subtitle [2020] the Secretary shall—
 - (1) conduct an evaluation of the accomplishments of the National Heritage Area; and
 - (2) prepare a report in accordance with subsection (c).
- (b) EVALUATION.—An evaluation conducted under subsection (a)(1) shall—
 - (1) assess the progress of the local coordinating entity with respect to—

- (A) accomplishing the purposes of the authorizing legislation for the National Heritage Area; and
- (B) achieving the goals and objectives of the approved management plan for the National Heritage Area;
- (2) analyze the Federal, State, Tribal, and local, and private investments in the National Heritage Area to determine the impact of the investments; and
- (3) review the management structure, partnership relationships, and funding of the National Heritage Area for purposes of identifying the critical components for sustainability of the National Heritage Area.
- (c) REPORT.—Based on the evaluation conducted under subsection (a)(1), the Secretary shall submit a report to the Committee on Natural Resources of the United States House of Representatives and the Committee on Energy and Natural Resources of the United States Senate. The report shall include recommendations for the future role of the National Park Service, if any, with respect to the National Heritage Area.

Source: P. L. 110-229, Subtitle B, Sec. 425

*****END SIDEBAR

7.9.2 Annual Evaluation

Evaluation, however, is an annual responsibility of the Commission, and should guide annual work plans, budgeting, communications, resource development, strategic planning, etc. Each program as it is designed and put into operation should include measurable objectives. Careful documentation of a program and its intended results permits an evaluation as to the success of the program. Long-term, this work will support the major federal evaluation expected for 2020.

ACTION: Establish measurable objectives at the time each program is designed and inaugurated, for annual review and documentation.

7.9.3 Meeting External Standards

Welcome to the world of charitable organizations. There is a wealth of information guidance to be had on the responsible operations of nonprofit organizations, the fiduciary responsibility of nonprofit boards, ethical fundraising, and much more. An excellent first-read guide is available through the New York Department of Law Charities Bureau, found at http://www.ag.ny.gov/publications/Right%20from%20the%20Start%20booklet%2009.pdf (accessed 12/29/2011). It includes a bibliography of websites and organizations that can provide in-depth advice. While it appears that there is not a set of standards of excellence specific to New York State (as there is in Maryland – see http://www.marylandnonprofits.org/dnn/), consider examining those standards that do exist. A good list is compiled by Independent Sector at http://independentsector.org/ compendium_of_standards (accessed 12/29/2011) and setting basic standards in the Commission's manual of operations.

ACTION: In setting up the parallel nonprofit organization and organizing the Commission's manual of operations, set basic standards of excellence and let partners, funders, and the public know such standards are part of the Commission's expectations for doing business.

7.10 Conclusion

Through the creation of this management plan, the Niagara Falls National Heritage Area Commission has begun to establish strong the partnerships necessary to implement the plan. It has also identified financial and other resources and a process to pursue them in order to sustain its operations and support its partners.

As stated earlier in this chapter, the Commission is not solely responsible for implementation; it will rely most of all on partnerships to execute major elements as conceived in this plan, beginning with the vision laid out in Chapter 1.



Table 7.XX Niagara Falls National Heritage Area – Partnership System Concept

Table /.XX Niagara Falls Nat	ntional Heritage Area – Partnership System Concept Partners														
Role/Function	Commission	Parallel Nonprofit	Friends' Group	State Parks	NYPA	Bridge Commission	Niagara River Greenway	Economic Dev Entities	Tourism Entities	Academic Institutions	Tribal Gov'ts	Local Gov'ts	Interpretive Sites	Local Business	National Park Service
Vision ("keeper of the flame")	х	х	х	х	х		х	х	х	х	х	х	х	х	
Measure, evaluate progress	х	х	х	х	х		х	х	х	х	х	х	х	х	х
Heritage area's partnership development programs:															
Training	х	х						х	х	х	х		х	х	х
Networking events	х	х	х		х		х	х		х			х	х	
Promotion	х	х													
Technical assistance	х	х													х
Give small grants	х	х	х				х					х			
Public outreach	х	х	х	х			х		х	х	х	х	х	х	
Advocacy	х	(x)	х				х	х	х		х	х	х	х	
Programs															
Interpretation	х	х		х	х		х		х	х	х		х	х	х
Marketing (promotion to potential visitors)	х	х	х	х	х	х	х	х	х	х			х	х	
Digital presence (website/portal, social media, apps, Google Earth, etc.)	х	х	х	х			х	х	х	х	х	х	х	х	x
Hospitality training	х	х		х				х	х	х			х	х	х
Wayfinding (maps) & promotion to visitors already here	х	х	х	х			х	х	х			х	х	х	х
Wayfinding sign system	х	х	х	х	х	х	х	х	х			х	х	х	
Trail development	х	х	х	х	х		х					х		х	
Interpretive Center	х	х	х	х	х		х	х	х	х	х	х	х		
Transportation	х	х		х		х		х				х		х	
K-12 education	х	х		х						х	х	х	х	х	х

	Partners														
Role/Function	Commission	Parallel Nonprofit	Friends' Group	State Parks	NYPA	Bridge Commission	Niagara River Greenway	Economic Dev Entities	Tourism Entities	Academic Institutions	Tribal Gov'ts	Local Gov'ts	Interpretive Sites	Local Business	National Park Service
Adult learning	х	х	х	х						х	х		х	х	x
Set quality standards for hospitality/visitor experience	х	х		х				х		х			х		
Relationship w/ NPS/NHA program for administrative needs	х														х
Manage federal funds	х	х													х
Fundraising for federal match	(x)	х	х							х	Δ	Δ	Δ		
Fundraising for programs beyond federal match	(x)	х	х							х	х	х		х	
SOURCE of (nonfederal) funds to help implement the plan (beyond their own projects)					х	х	х	х				х		х	

 Δ If receiving National Heritage Area grant