

III. Partnership Concepts

Evaluation of Proposed National Historic Trail Concept

The first question to which the study team responded was whether a women's rights national historic trail was feasible. Under the National Trail System Act, a national historic trail must meet the following criteria:

A. It must be a trail or a route established by historic use and must be historically significant as a result of that use.

B. It must be of national significance with respect to any of several broad facets of American history. To qualify as nationally significant, historic use of the trail must have had a far-reaching effect on broad patterns of American culture.

C. It must possess significant potential for public recreational use or historical interest based on historic interpretation and appreciation.

Criterion A: The proposed trail is not a physical route that can be documented and mapped. Though many of these properties are located in geographic proximity to one another, there is no historical evidence documenting a well-defined and consistent route among them. These properties are linked by their connection to one or more of the five themes defining "women's rights" for the purposes of this project. Currently, there is no designation under the National Trail System Act that describes a trail linking thematically related properties.

Criterion B: Based on a general understanding of the historical relevance of the organized women's rights movement from 1848 to the present, its national significance is clear. The women's rights movement has had a far reaching effect on broad patterns of American culture.

Criterion C: Of the nearly 300 properties included in the property sample, just about one-third of them were available to the public in one way or another. These venues could offer a variety of opportunities for public use and enjoyment. These opportunities include interpretive tours of historic properties and neighborhoods, architectural study, indoor and outdoor interpretive exhibits, lectures and other educational programs, and special events. The properties open to the public are dispersed across the northeastern United States, and there are few areas where there are dense concentrations of such properties.

Although a proposed trail linking thematically-related properties does not meet the criteria defined under the National Trail System Act for a national historic trail, it may be possible to identify a travel itinerary or auto tour route.

The study team also considered the feasibility of designating a long-distance auto tour route in the corridor between Boston and Buffalo. While there are heavy concentrations of properties in the Greater Boston area in Massachusetts and in the Rochester-Seneca Falls-Syracuse area of New York, an extensive area between these two



Source: Library of Congress

Elizabeth Cady Stanton & Susan B. Anthony

Resolved, that woman is man's equal, was intended to be so by the Creator, and the highest good of the race demands that she should be recognized as such.

-Declaration of Sentiments, 1848

places has very few identified properties. From a management and a visitor experience standpoint, this geographic gap made a long-distance trail much less viable.

After evaluating a long-distance trail concept, the study team proceeded to develop a range of management concepts that could support the recognition, promotion, and protection of women's rights history properties. In considering these concepts, it is important to note that Congressional authorization and funding of any new commitments by the National Park Service will have to be considered in light of competing priorities for existing units of the National Park Service and other programs.

The study team considered three partnership concepts. One focused on a smaller-scale Women's Rights History Trail concentrated in upstate New York. In recognition of the importance of women's rights in the history of the United States, the study team considered two other partnership concepts that were national in scope.

Descriptions of the three partnership concepts follow.

Partnership Concept 1 – "Votes for Women" History Trail (Upstate New York)

Concept:

Under this concept, the National Park Service would work in partnership with a number of historically and thematically related properties within the crescent-shaped region bounded by Rochester in the west, Syracuse/Fayetteville in the east and Seneca Falls/Waterloo in the south to develop an auto tour route. The 15 to 20 properties associated with this proposed auto route are most strongly associated with women's suffrage, thereby making "Votes for Women" the primary theme to build upon for interpretive purposes. If additional properties associated with other women's rights themes are identified within this area, it would be possible to expand the number of participating properties and to expand the thematic scope of the trail. However, under this concept the geographic area under consideration would remain the same.

Under this concept, it is acknowledged that similar local initiatives are underway, particularly efforts to establish a Central New York Freedom Trail highlighting properties associated with both the Underground Railroad and the women's rights movement. The National Park Service and its partners would work collaboratively with existing local initiatives to achieve common goals and to minimize confusion on the part of the visitor.

Visitor Orientation & Experience:

Visitors to the various properties associated with the auto route, including places such as Women's Rights National Historical Park in Seneca Falls/Waterloo, the Susan B. Anthony House in Rochester, and the Matilda Joselyn Gage House in Fayetteville, would have numerous opportunities to learn about the existence of the auto route and the many other properties associated with it. Each public property on the auto route would have brochures available to the public for free as well as a published guidebook available for sale. The primary orientation exhibit for the auto route would be located at Women's Rights National Historical Park in Seneca Falls. The orientation exhibits at the national historical park would provide the visitor with an overview of the many dimensions of the women's rights movement as well as a brief introduction to women's suffrage, the primary theme of the trail. The orientation exhibit would also provide a brief description of the participating properties.

Most, but not all, participating properties would be open to the public. Exterior exhibits (interpretive waysides) could be available at inaccessible participating properties along the auto route. Audio and video tours could also be developed for use in private vehicles along the tour route. Other communication technologies and broadcast media could also be considered for providing visitor information, such as 1610 AM radio and intelligent transportation systems (ITS).

Using existing roads, a coordinated system of signage and a uniform logo for the auto route would be developed to guide visitors to participating properties. The National Park Service and its partners would work closely with local communities, regional planning bodies and tourism offices, as well as existing local heritage tourism initiatives, to ensure that any new signage developed for the auto route complements local and regional objectives for informational signage.

Administration:

The National Park Service would coordinate the management and development of the auto route in partnership with participating properties, other federal agencies, and state and local governments. The National Park Service would coordinate the development of a management plan, visitor services standards and guidelines for participating properties, informational brochures and guidebooks, and a signage and identity program.

The National Park Service would monitor participating properties for compliance with multilaterally established auto route standards. Participating properties that fail to demonstrate an effort to comply with auto route standards could lose their eligibility for funding and technical assistance or could be effectively removed from the auto route.

The National Park Service would provide interpretive and educational program assistance to participating properties. This assistance could take a number of forms and could range from providing interpretive staff support at special events to the development of curriculum packages, interpretive exhibits, and publications.

Under this concept, the Women's Rights National Historical Park would administer a short-term matching grant to support historic preservation of participating properties. The grant would require a 50/50 match and would be made available competitively on an annual basis over a 5-year period.

The National Park Service would also provide support for research and documentation of participating properties. Limited funds and technical assistance could be made available to develop historic structure reports, historic furnishing reports, cultural landscape reports, and other appropriate documentation to support effective management of historic properties.

Finally, the National Park Service would seek to foster partnerships among participating properties and would encourage collaborative programming and events within the context of the auto route. Generally, collaborative programs would emphasize the primary theme of "Votes for Women;" however, they could be expanded to embrace other aspects of the women's rights movement associated with the principal individuals associated with the region (e.g. religion, dress reform, etc.).

Under this partnership concept, National Park Service involvement with the "Votes for Women" Auto Route would continue indefinitely.

Program Participation/Property Selection:

Because the vast majority of properties located within this prescribed geographic area are associated with the women's rights category of "Politics," this concept emphasizes the participation of individual historic properties associated with women's suffrage. Gravesites in the area that are associated with key participants in the effort to win the right to vote could also be identified as points of interest for the visitor. With the exception of gravesites, all properties associated with the trail should be on or eligible for the National Register of Historic Places. Under this concept the period of significance runs from 1848, the date of the first Women's Rights Convention at Seneca Falls, to 1923, the 75th anniversary of the first Convention and also the date that Alice Paul formally initiated the campaign for the Equal Rights Amendment at the Presbyterian Church in Seneca Falls.

Properties identified as possible participants on the history trail would only be included on the trail with the expressed consent of the property owner. These selected properties would be specifically named in authorizing legislation for the trail and would be eligible for interpretive and preservation assistance.

Legislative Requirements:

As noted above, properties selected for participation on the trail would be specifically named in legislation authorizing the trail. Authorizing legislation would also enable the Secretary of the Interior to certify additional trail properties. Legislation would be required to expand the authorities of Women's Rights National Historical Park to allow for trail management, related planning and construction, and necessary appropriations.

Estimated Costs to Federal Government:*Annual*

Staff/operations total: approx. \$160,000

Publications: approx. \$65,000

Curriculum pkg.: \$50,000

Project Funds (One time costs)

Exhibits: \$275,000 (gross)

Signage: \$50,000 (gross)

Strategic Plan for Trail: \$175,000

Grants

Matching historic preservation grant: \$250,000 per year/5 years

Partnership Concept 2 – National Women's Rights History Project**Concept:**

Under this concept, the National Register program would lead a collaborative effort with State Historic Preservation Offices nationwide to survey, evaluate, and nominate women's rights history properties to the National Register of Historic Places. Through the National Register program, the National Park Service would offer annual grants to State Historic Preservation Offices for up to 5 years to support this work. The National Park Service would also expand and enhance the current National Register travel itinerary website, "Places Where Women Made History," so that the results of the inventory are made available to the general public. As is the case now, the website would provide a brief historical description of each property, note which properties are open to the public, and provide links to related websites, as available.

Visitor Orientation & Experience:

Potential visitors would learn of women's rights historic properties across the country through the online inventory made available through the National Register of Historic Places and a series of state or regional companion publications. Both the online site and the companion publications would offer a historical overview of the women's rights movement and its countermovements and would provide related details associated with the histories of each of the listed properties. These online and published resources would also describe whether properties are open to the public and hours of operation, and would provide links to related websites. Visitors to the website would be able to search for women's rights historic properties geographically, thematically, and chronologically.

Visitors could travel to properties named in the online inventory or companion guides but experiences would vary widely from property to property. Directional and interpretive signage would be limited to what is currently being employed by participating properties. The National Park Service would not coordinate programming among properties. However, visitors to some communities or regions where there are concentrations of properties could find organized programs such as walking tours of women's historic properties, special events, and collaborative programming among women's historic properties.

Administrative Structure:

The National Park Service would manage the Women's Rights History Project through the National Register program, working in cooperation with State Historic Preservation Offices (SHPOs). In consultation with SHPOs, as well as the scholarly community, the National Park Service would sponsor the development of a series of historic context statements associated with a number of women's rights history themes (e.g. politics, education, etc.)¹. These historic context statements would provide a foundation for identifying and evaluating properties related to each women's rights theme.

Over a 5-year period, the National Register program would administer grants to state historic preservation offices specifically to support the inventory and evaluation of women's rights properties. Approximately \$50,000 per year could be made available to each participating state during this prescribed period of time. This inventory and evaluation of women's rights properties is expected to result in a significant number of new nominations to the National Register as well as possible amendments to documentation for existing National Register-listed properties to better reflect their association with women's history.

The National Park Service would also provide limited financial and technical support for expanded research and documentation of National Register-eligible properties associated with the project. The grants proposed to support identification and evaluation of properties could also be used to support more in-depth projects such as the production of measured drawings, photodocumentation, and historic structures reports. This support would be made available annually on a competitive basis and the award of funds or technical assistance would place great emphasis on the fulfillment of historic preservation needs.

In order to make this information accessible to the general public, the National Park Service would develop a National Women's Rights History Project website. The website would build upon the existing web-based National Register travel itinerary, "Places Where Women Made History," which highlights a wide range of women's historic properties across the states of New York and Massachusetts (www.cr.nps.gov/nr/travel/pwwmh/). Similar to the current "Places Where Women Made History" website, the National Women's Rights History Project would provide an image of each historic property and possibly the people associated with it, a brief description and history of the property, address information, and public access information. In contrast, the National Women's Rights History Project website would highlight properties nationwide and would focus on properties illustrating the many facets of the women's rights movement. The National Women's Rights History Project would also include an overview of the history project. Information on the website would always be free to the public.

The National Park Service would also develop a series of companion publications that could take the form of regional or state guidebooks. These "take-along" guides would contain the same information as is found on the website. These publications would be available for sale at a variety of retail outlets including the many National Park Service cooperating associations that operate bookstores at National Park units across the country.

As noted above, the National Park Service, through the National Register program, would support grants to state historic preservation offices in participating states over a five-year period. The National Park Service would continue to maintain and update the website and provide financial and technical assistance for research and documentation indefinitely.

Finally, due to the large volume of general women's historic properties that have not been evaluated for National Register eligibility, the expansion of the thematic scope of this project beyond women's rights may be warranted.

Program Participation/ Property Selection:

During the course of the project a wide range of women's rights properties are likely to be identified and evaluated in each participating state. The project website would feature only those properties that are currently on or are determined to be eligible for listing on the National Register of Historic Places and whose owners have expressed their consent to be included in the project. Historic properties of local, state, and national significance could all be included in the project.

Similarly, properties must be currently on or determined to be eligible for listing on the National Register of Historic Places in order to be eligible to compete for research and documentation funds and assistance.

Initially, emphasis would be placed on those properties associated with the multiple facets of the women's rights movement including but not limited to politics, economics, education, religion, and social and family rights. The period of significance to be considered would span from the date of the Seneca Falls Women's Rights Convention in 1848 to 1951 (the present less 50 years) to comply with National Register standards and guidelines.

If time and resources permit, the thematic scope of the project could be expanded to include general women's history properties. Likewise, the period of significance could be expanded.

Legislative Requirements:

Congress would authorize the establishment of and appropriations for the National Women's Rights History Project.

Estimated Costs to Federal Government:

Annual

Staff/ Operations total: \$600,000

Publications (annually): \$50,000

Project Funds (One time costs)

Context Statements (6): \$1.2 million (\$200,000 each)

Enhanced website: \$100,000

Grants

Support State Historic Preservation Offices (nationwide): approximately \$2.5 million per year for 5 years (\$12.5 million). (Approximately \$50,000 per state per year.)

Partnership Concept 3 – *National Women's Rights History Project and Partnerships Network*

Concept:

The third concept enhances the National Women's Rights History Project by creating a partnerships network. It also expands the range of participating properties allowing more than just National Register-eligible properties to participate. Other places and institutions such as commemorative public art installations, archives, and museums could also be included among partnerships within the network. Under the National Women's Rights History Project and Partnerships Network, the National Park Service would foster the development of a partnership-based network offering financial and technical assistance to participating members. The Network would be managed through a non-governmental organization, identified through a competitive process, which would work in partnership with the National Park Service and state historic preservation offices to coordinate the Network's operation. The National Park Service's relationship with the Network would cease after a prescribed period of time – possibly 10 years – at which point the Network would operate independently. The Network would offer matching grants and technical assistance for interpretive and educational program development and would emphasize partnerships with strong collaborative proposals that could include a variety of property types that would be anchored by one or more National Register-eligible properties.

Visitor Orientation & Experience:

An online visitor center would include all of the web-based information described above in the National Women's Rights History Project as well as materials that specifically support the partnerships network. In this concept, the website would include a description of the partnerships network, information on program benefits and eligibility for program participa-

tion, as well as information about tours and collaborative programming offered by the network's participating partnerships.

Partnerships could sponsor special events and programs, coordinate travel itineraries and guided tours, and develop educational materials for distribution to school groups. Information about these programs and events could be made available to the visiting public on this website. Finally, through the partnerships, more information would be made available regarding what the visiting public should expect at any given property (e.g. visitor amenities such as restrooms, universal access, parking, and gift shops).

In visiting properties participating in network partnerships, visitors would be provided with some orientation to the themes and other properties associated with the partnership and would be likely to have the opportunity to visit multiple partnership properties and participate in one or more partnership-wide events.

Under this partnership concept, the Network management entity and the National Park Service would jointly develop a series of published guides and brochures describing the overall network and its participating partnerships. Individual partnerships could also develop the brochures and guidebooks specifically for their group. A logo would be developed for use on publications, websites, signage, and other visual media that would clearly identify properties participating in the partnerships network.

Administrative Structure

Working in partnership with the National Park Service and state historic preservation offices, an independent management entity would launch the Partnerships Network. The management entity would be a non-governmental organization selected through a competitive process such as a Request for Proposals (RFP). The management entity for the Network must be able to receive and disburse federal funds and have authority to enter into agreements with the federal government. The National Park Service would provide operational support to the management entity for a prescribed period of up to 10 years, after which the management entity would operate independently.

The management entity would work collaboratively with the National Park Service, State Historic Preservation Offices, and other key partners to prepare a strategic plan for the network. The management entity would also raise funds independently from both private and other public sources, provide technical assistance to members of the partnerships network, coordinate network-wide programs, and promote network properties.

In addition to its role described in Partnership Concept 2, the National Park Service would establish the online visitor center, which would then be maintained and updated by the Network management entity. The National Park Service would also help the management entity establish a technical assistance program for interpretation and education. A matching grant program, ultimately administered by the management entity, would provide financial assistance for interpretive and educational programs on a competitive basis.

The National Park Service would also provide direct grants to State Historic Preservation Offices in participating states to support a matching historic preservation grant program specifically targeted for historic properties associated with the women's rights movement. Unlike the technical assistance funds administered by the network management entity, the historic preservation grant program would be administered exclusively by State Historic Preservation Offices with input from the network management entity. The historic preservation grants would be made available over a 5-year period through a competitive process and would require a 50/50 match. Support for historic preservation funding would be limited to those properties currently on or determined eligible for listing on the National Register of Historic Places.

The National Park Service would provide limited financial and technical support for expanded research and documentation of Register-eligible properties associated with the project. This support would extend beyond the grants proposed to support identification and evaluation of properties and would include more in-depth projects such as the production of measured drawings, photo documentation, and historic structure reports. This support would be made available annually

on a competitive basis, and the award of funds or technical assistance would place great emphasis on the fulfillment of historic preservation needs.

Finally, the National Park Service and the management entity would work together to foster partnerships at the network membership level as well as nationally. The National Park Service would assist network managers to leverage other federal funds and to work with other federal agencies and national foundations to garner the support needed to fulfill the mission and goals of the network and its participating partnerships. Links to organizations other than the National Park Service are particularly important to support the protection, operation, and programming of participating network properties that would not be eligible for National Park Service assistance (e.g. those properties not determined eligible for the National Register of Historic Places) but could be eligible for assistance from other sources. The National Park Service could work with the Partnerships Network as well as participating partnerships to support their efforts to seek other sources of assistance.

The network membership would be composed primarily of locally based partnerships whose representatives would be the primary point of contact for technical and financial assistance. The participating partnerships would coordinate activities among partnership properties, raise funds, promote properties associated with the partnership, and undertake demonstration projects and programs. An example of a locally based partnership of women's historic properties may be the Boston Women's Heritage Trail. This organization was founded by educators in the Boston city school system and has worked to research, identify, and map numerous neighborhood-based women's history walking tours throughout the city of Boston. The Boston Women's Heritage Trail has also published an informative and attractive guide describing five women's history walking tours in the city's downtown neighborhoods. The Boston Women's Heritage Trail continues to offer quality programming and experiences to local youth through the city's schools.

Program Participation/ Property Selection:

As noted above, the range of possible properties participating in the Network would be expanded, allowing more than just Register-eligible properties to participate. Other places and institutions such as commemorative public art installations, gravesites, archives, and museums could also be included among partnerships within the network. Any one or some combination of the subthemes used to define the women's rights movement could be represented (Politics, Economics, Education, Religion, and, Family and Society) and the period of significance would span the years from 1848 to 1953 (the present less 50 years).

The Network would emphasize partnerships among women's rights historic properties, which could include pre-existing or new women's heritage trails. Each partnership should include one or more "anchor" properties that are on or eligible for inclusion on the National Register of Historic Places and have an advanced menu of visitor amenities. These anchor properties could be eligible for more assistance commensurate with the level of services that they provide to the public.

Anchor properties should:

- ♦ offer necessary facilities to support public use (e.g. parking, public restrooms)
- ♦ be open to the public on a regular basis (at least 5 hours/day, 5 days/week)
- ♦ offer educational programs and make information about the network available to the public
- ♦ be adequately staffed, and
- ♦ be adequately protected.

The Network management would identify participating partnerships in two phases. During the first phase, based on the results of the inventory conducted through the National Women's Rights History Project, the Network's management entity would issue a request for proposals (RFP) to selected properties. Once the phase 1 partnerships are in place and the Network is solidly established, phase 2 of the program could be initiated allowing women's rights history partnerships to

nominate themselves for program participation. Self-nominating partnerships would be selected by the Network management entity using predetermined criteria. Both phase 1 and phase 2 participating partnerships would be eligible to compete for all financial and technical assistance offered through the program.

As in Partnership Concept 2, if time and resources permit, the thematic scope of the project could be expanded to include general women's history properties. Likewise, the period of significance could also be expanded.

Legislative Requirements:

Congress would have to authorize the establishment of and an appropriation for the National Women's Rights History Project and Partnerships Network.

Estimated Costs to Federal Government

Annual

Staff/Operations total: \$1.1 million

Technical Assistance/Research Program (annually): \$500,000

Publications (annually): \$75,000

Project Funds (One time costs)

Context Statements (6): \$1.2 mil

Enhanced website: \$100,000

Strategic Plan: \$200,000

Grants

Support to SHPOs (nationwide): approx. \$2.5 million per year for 5 years (\$12.5 million). (Approximately \$50,000 per state per year.)

Preservation Matching Grant Fund (through SHPOs): \$3million per year for 5 years (\$15 million)

Options eliminated from further consideration

Traditional heritage area

A "National Heritage Area" is a place designated by Congress where natural, cultural, historic, and scenic resources combine to form a cohesive, nationally distinctive landscape arising from patterns of human activity shaped by geography. These patterns make National Heritage Areas representative of the national experience through the physical features that remain and the traditions that have evolved in them. Continued use of the National Heritage Areas by people whose traditions helped to shape the landscapes enhances their significance.

The commemoration of the women's rights movement does not lend itself to the definition of a traditional national heritage area. As an American political and social movement, it is represented by people, ideas, and actions that were not confined to a single geographic region within the context of the American landscape. Nor did these people, ideas, or actions and the resources associated with them "combine to form a cohesive, nationally distinctive landscape." The impact of the women's rights movement was to the political landscape and intellectual history of the United States – far less tangible, but no less significant. The designation of a heritage area with a discrete boundary would not allow for the effective stewardship of resources associated with the women's rights movement in the Northeast or nationwide nor would it support comprehensive interpretation of this national story.

Identification of new sites for inclusion within the park system

Women's Rights National Historical Park, located in Seneca Falls and Waterloo, New York, was designated in 1980 and commemorates a watershed event in the women's rights movement – the first women's rights convention and the adoption of the Declaration of Sentiments. Interpretation at the park and information provided on the park's website emphasize the multifaceted nature of the women's rights movement and cover its evolution from the 1848 convention to the current day. There are many other sites within the National Park System that allow for the interpretation of different aspects of the women's rights movement during the period between 1848 and 1953. These sites include but are not limited to: Clara Barton National Historical Park in Glen Echo, Maryland; Mary McLeod Bethune Council House National Historic Site in Washington, DC; Maggie L. Walker National Historic Site in Richmond, Virginia; and Rosie the Riveter National Historical Park in Richmond, California.

Because there are several extant National Park Service units that allow for the interpretation of the women's rights movement and the property sample was undertaken at a reconnaissance survey level that does not provide sufficient detail to make recommendations for additional units of the National Park System, no such recommendations were made during the course of this study. If appropriate, special resource studies that apply the National Park Service's Criteria for Parklands to evaluate specific properties for inclusion in the National Park System could be undertaken if funding were available.

Consultation and Coordination

During the study, the Women's Rights National History Trail Feasibility Study has been presented in a number of venues. The study was represented on panels at two women's history conferences – the Conference on Women and Historic Preservation in May 2000 and the Worcester Women's History Conference in October 2000. The study was also presented to the Women's Progress Commemoration Commission on two separate occasions (July 2000, June 2001). The study team has been in contact with the National Collaborative for Women's History Sites throughout the project. All of these venues offered the opportunity to share the study process and preliminary findings with representatives of a wide range of women's history and historic preservation organizations and programs.

The project manager was able to establish informal contact with most of the state historic preservation offices in the study area, primarily through each office's historic inventory coordinator. All of the state historic preservation offices nationwide will be invited to review and comment on the content of the study. Other organizations and institutions that will receive a copy of the draft study include but are not limited to the following:

American Historical Association	National Women's History Project
Association of State and Local Historians	New Hampshire Preservation Alliance
Berkshire Conference on History of Women	Organization of American Historians
General Federation of Women's Clubs	Preservation Association of Central New York
National Council on Public History	Preservation Worcester
National Parks and Conservation Association	Worcester Women's Heritage Project
National Trust for Historic Preservation	Women's Progress Commemoration Commission

Endnote:

¹ A historic context statement defines a unit for planning purposes that groups information about historic properties based on a shared theme, specific time period, and geographical area. The historic context is the cornerstone of the planning process. The goal of preservation planning is to identify, evaluate, register and treat the full range of properties representing each historic context, rather than only one or two types of properties. Identification activities are organized to ensure that research and survey activities include properties representing all aspects of the historic context. Evaluation uses the historic context as the framework within which to apply the criteria for evaluation to specific properties or property types. Decisions about treatment of properties are made with the goal of treating the range of properties in the context. The use of historic contexts in organizing major preservation activities ensures that those activities result in the preservation of the wide variety of properties that represent our history, rather than only a small, biased sample of properties. [Director's Orders 28]