

HERITAGE2031

MARYLAND'S STATEWIDE PRESERVATION PLAN

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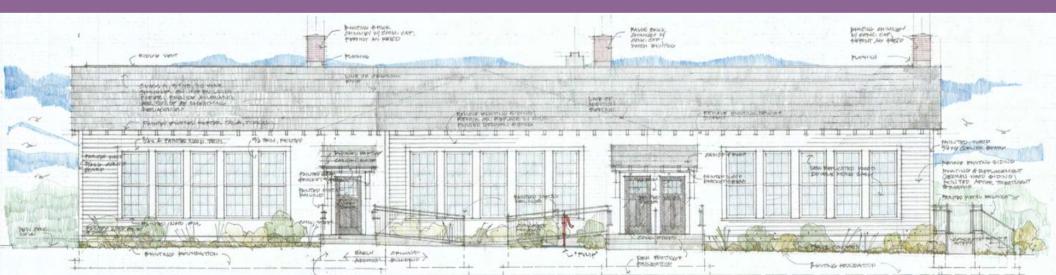
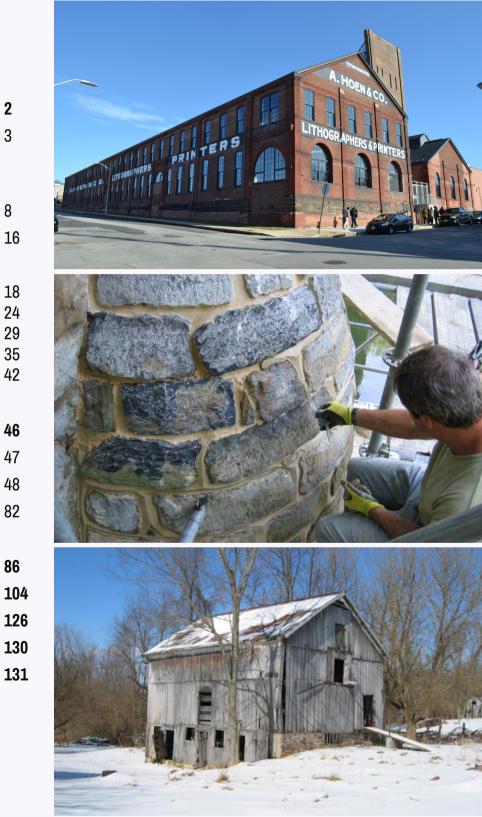


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Section 1: Heritage2031

The Statewide Preservation Plan

The Maryland Historical Trust (MHT), a division of the Maryland Department of Planning (MDP) is the state agency dedicated to preserving and interpreting the legacy of Maryland's past. Governed by a 15-member Board of Trustees, MHT offers an array of state and federal programs that support historic preservation, archaeology, and cultural heritage protection and interpretation. MHT has administrative headquarters in Crownsville and operates Jefferson Patterson Park and Museum (JPPM) in Calvert County, which in turn houses the Maryland Archaeological Conservation Laboratory (MAC Lab).

As Maryland's State Historic Preservation Office (SHPO), MHT is mandated to "prepare and implement a comprehensive statewide historic preservation plan," pursuant to Section 101(b)(3)(c) of the National Historic Preservation Act, as amended. Regulations require a plan "that provides guidance for effective decision making about historic property preservation throughout the state." In this way, the plan serves the broader preservation community, not just MHT. In addition to historic preservation, which typically refers to architecture, the plan includes archaeology and cultural heritage more broadly.

In recent years, MHT has updated the statewide preservation plan at five-year intervals. However, in soliciting feedback for the last iteration of the statewide plan, it became clear that the goals identified remained relevant for a much longer period. For this reason, the last plan update was presented as a sequel to the previous one (*PreserveMaryland* and *PreserveMaryland II*, respectively) and retained the same goals. For the current planning process, MHT made the decision to extend the timeframe to eight years (2024-2031), with a midterm update in 2028. Rather than repeat the full public engagement of a typical planning cycle at the midterm, MHT will work with partner agencies and organizations to update the objectives and strategies within the goals identified in *Heritage2031* and reissue the plan.

Once the plan is completed, NPS reviews the final document to ensure that it:

- includes significant and meaningful public participation;
- · identifies significant issues affecting historic resources; and
- proposes realistic solutions and sets priorities for preservation action.

The final plan is approved by the MHT Board of Trustees prior to public release. Although the plan is intended to serve as a roadmap for the broader preservation community, and MHT encourages participation in the implementation, there is no mandate or requirement for individuals or organizations to adhere to the plan. MHT will use the plan to inform its agency's work over the next eight years and report annually to NPS on its progress.



Who Lived and Labored at Randsell

Partners & Process

Heritage2031 is the result of collaborative work among many partners engaged in historic preservation, archaeology, and cultural heritage, including Preservation Maryland (PM), the Maryland Commission on African American History and Culture (MCAAHC), the Archeological Society of Maryland (ASM), the Council for Maryland Archeology, the Maryland Association of Historic District Commissions (MAHDC), the Maryland Heritage Areas Coalition, the Maryland Museums Association (MMA), Maryland Humanities, the Maryland Center for History and Culture (MCHC), and the NPS Chesapeake Bay Office. MHT Trustee Samuel J. Parker, Jr. served as the chair of the planning process. These partners gave feedback on planning strategies, helped develop questions for public input, advertised public meetings and surveys, co-hosted focus groups, facilitated discussions, and helped bring their constituents to the table. (For more information on the key agencies and organizations involved in the planning effort, see the directory in Appendix III.)

It is important to note that MHT is not the only agency responsible for Maryland's historic and cultural properties. State agencies that participated in the planning process include the Maryland Department of Natural Resources (DNR), which oversees state parks and intersects with MHT's work on climate planning and adaptation; the Maryland Department of Transportation (MDOT) and the State Highway Administration (MDOT SHA), which operates the Maryland Scenic Byways program and the Historic Markers program and conducts archaeology throughout the state; the Maryland Department of Housing and Community Development (DHCD), which houses the Maryland Main Street program and financial incentive programs including Community Legacy grants, which often support preservation and rehabilitation; and the Maryland Department of General Services, which maintains historic properties in state ownership. MHT staffs the inter-agency Maryland Heritage Areas Authority (MHAA) and the African American Heritage Preservation Program (AAHPP), a joint program of MHT and MCAAHC, which provide substantial financial support to historic preservation and cultural heritage efforts throughout the state. MHT's participation in the Adaptation and Resiliency Working Group of the Maryland Commission on Climate Change and the Smart Growth Coordinating Committee of the Smart Growth Subcabinet allows *Heritage2031* to be integrated into those interagency efforts as well.

In preparation for *Heritage2031*, MHT reviewed relevant strategic plans from partner organizations, as well as planning documents from agencies that intersect with historic and cultural resources. Where appropriate, these programs and entities are referenced in the plan's strategies. MHAA and JPPM are embarking on strategic planning processes that will use this document to inform their future efforts and ensure consistency.



MHT received feedback from participants around the state, including (but not limited to) representatives of state agencies and local governments, public officials, community advocates, consultants, developers, historic preservation commissioners and planners, stewards of historic properties and cultural sites, members of indigenous communities and state-recognized tribes, and nonprofit staff and volunteers. Opportunities for public participation included:

- Regional public meetings in Hagerstown, Havre de Grace, Owings, Baltimore City, Frederick, and Cambridge (approximately 75 attendees)
- Regional in-person meetings in Hagerstown and Columbia on African American heritage, co-sponsored with MCAAHC (approximately 20 attendees)
 - A virtual town hall meeting (approximately 30 attendees)
- Virtual focus groups organized by topic and profession (approximately 240 attendees)
 - Preservation Planners (with MAHDC)
 - Culture, Climate, and Resiliency
 - Documenting Underrepresented Communities (with NPS Chesapeake Bay Office and Maryland Humanities)
 - Archaeologists (with ASM)
 - Architects and Developers Roundtable (with Ann Powell, PlanB and Vice Chair, PM)
 - Maryland Inventory of Historic Properties (MIHP) / National Register of Historic Places (National Register) Priorities and Issues
 - Museums and Cultural Institutions (with MMA and MCHC, two focus groups)
 - AAHPP Priorities (with MCAAHC, two focus groups)
- A general survey open April to August 2023 (398 responses)
- Targeted surveys to constituent groups (81 responses)
 - General public survey: pushed out through social media, email distribution, public meetings, Maryland Association of Counties conference
 - Archaeology survey: distributed via Discovering Archaeology Day at JPPM, Council for Maryland Archaeology, Maryland Advisory Committee on Archaeology, ASM, people who have self-selected for MHT's archaeological email distribution list
 - Student survey: developed with University of Maryland (UMD) graduate student Elizabeth Mekonnen, outreach to preservation-related disciplines at the UMD, Goucher College, Morgan State University, University of Maryland Baltimore County (UMBC)
 - Cultural/historical institutions survey: developed and circulated in partnership with MMA and MCHC
 - MDP regional planners survey: combined with meeting to solicit feedback on overall planning issues by region related to preservation

For the general survey, the questions were:

- What aspects of cultural heritage are most important to you?
- What do you think is most critical to protect the heritage that matters to you?
- What do you feel is the largest obstacle facing historic preservation, archeology, and/or cultural heritage preservation?
- What do you feel is the most important benefit of historic preservation, archeology and/or cultural heritage preservation?
- What do you feel can be done to improve the practice of historic preservation, archaeology and/or cultural heritage preservation in Maryland?

The targeted surveys were structured similarly, with customization based on topic or audience.

The public regional meetings were also structured around a set of open-ended questions, although all feedback was welcome and recorded. The questions were:

- What are your top goals for historic preservation, archeology and/or cultural heritage in your region?
- What are some of the key obstacles or threats to historic properties, archeological sites and/ or cultural heritage in your region?
- Are there property types or local histories (historic contexts) that are particularly threatened or under-documented in your region?
- What can MHT, other agencies or partner organizations do to better support your preservation efforts?
- Is there anything more that you'd like to share with us today?

All public engagement opportunities were advertised by email (more than 17,000 recipients), social media (more than 7,600 followers) and plan partner organizations (reach unknown). Prior to finalization, *Heritage2031*'s summary of public feedback and the draft goals and objectives were posted online for 30 days of public comment. MHT staff also followed up directly with relevant state agencies to ensure that they had an opportunity to review the plan and affirm its alignment with agency goals. In response to the draft, MHT received dozens of comments through MarkUp, an online application that allowed for collaborative feedback, as well as a Google Form set up for this purpose. Staff also directly solicited input on the draft from the MHT Board and project partners, including PM, MCAAHC, DNR, DHCD, Maryland State Archives (MSA), MMA, the Maryland Coalition of Heritage Areas, and the Maryland Commission on Indian Affairs (MCIA). Feedback on the public draft was very positive and, in response to comments, we have added strategies and clarifying language to finalize these portions of the plan.



Planning Timeline

							Analysis								
			One-	-on-one stakeholder interviews, primarily representing state agency partners											
			Develop and distribute targeted and general						5		Draft pl posted comme	for Dr	nal plan oduced		Final approval by MHT Board and NPS
	Create plan web page, hold key partner meetings														
Internal meetings, background read to prepare for plan launch							Regional public meetings			Internal meetings, partner meetings to identify draft goals/objectives/ strategies				_	_
Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024

Public Outreach: Summary of Feedback & Issues Raised

Through surveys, public meetings, and focus groups, members of the public provided more than 2,200 comments for the 2024-2031 planning process. MHT staff individually coded and analyzed all comments received to help identify broad themes and issues, presented below.

Changes from PreserveMaryland to Heritage2031

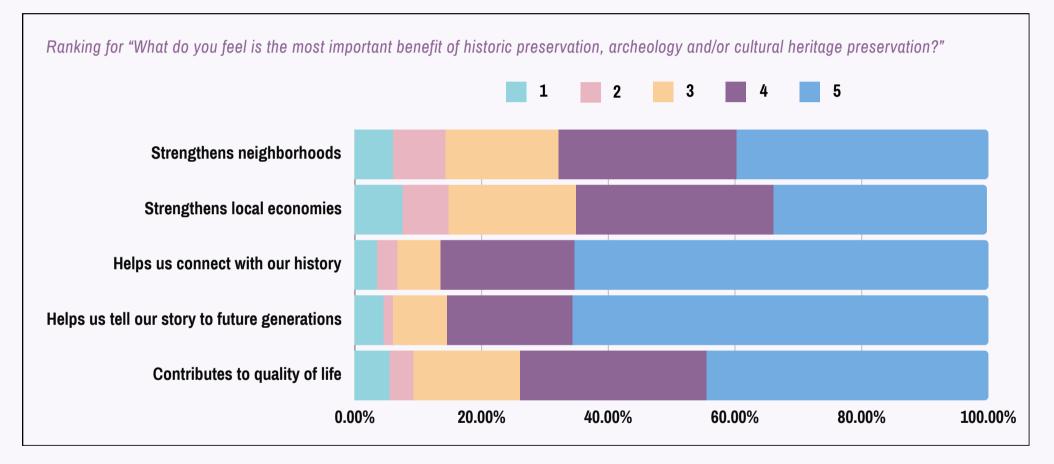
In one public meeting, a participant suggested that we could just continue to use the same set of goals from the *PreserveMaryland* plans (2014-2023), given how broad they are and that so much feedback could be categorized within those umbrellas. While the general observation is true, the nature and type of feedback we received indicated that circumstances were markedly different than in the previous planning processes. Many of *PreserveMaryland II*'s objectives had been accomplished or seen substantial progress; however, many of the recommended actions to improve networking and collaboration (Goals 4 and 5) were disrupted by the pandemic. Public meetings in 2023 showed a fragmented community, substantial staff turnover at the local and state levels, diminished volunteer capacity, and a lack of information about resources available. For these reasons, *Heritage2031* includes more information intended to help orient people to existing resources and networks, in addition to recommended strategies to address these needs.

Public participation also differed in significant ways – for example, fewer people participated in in-person meetings, but more people participated in surveys and virtual offerings. We also received less feedback about regional needs and challenges – likely due to these changes in modes of participation – than in the *PreserveMaryland* planning efforts. As a result, we did not have enough feedback to inform separate sets of regional objectives as in previous plans and have instead focused on statewide recommendations. As in previous years, however, entities operating on a local and/or regional level are encouraged to use these goals and objectives to guide their activities as well.



Importance of Preservation in Revitalization, Identity, & Quality of Life

Overwhelmingly, from the general public, we heard that historic preservation, archaeology, and cultural heritage play important and underappreciated roles in understanding Maryland communities and their histories. Participants in the general survey, for example, prioritized the most important benefit(s) of cultural heritage as "helps us connect with our history" and "helps us tell our story to future generations," with 65% of respondents ranking each of these choices as a "5" (see graph below). Related feedback included a widespread concern about lack of history/related instruction in schools and a need for educational and interpretive programs to engage youth.



Notably, the focus on community identity and learning from the past seem to have often connected to current cultural concerns including racial justice, challenging and changing historical narratives, diversifying perspectives within history to include marginalized peoples, and an appreciation of the role that history plays in helping us understand the present. We believe this context offers an important opportunity for people involved in heritage preservation and interpretation to make meaningful contributions to these local, state, and national conversations; indeed, many organizations and entities have already stepped up to do so. While we received a range of comments, overwhelmingly participants favored a focus on justice, equity, access, and inclusion to help Marylanders better understand their own histories and engage together for future progress.

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Practitioners working within preservation and related fields were more likely to identify the importance of preservation and cultural heritage in economic revitalization and quality of life. They also shared a widespread concern about a lack of advocates for historic preservation (on the state and local levels), a lack of common messaging points, and insufficient data to persuade decision-makers about these benefits. Respondents of all types noted a widespread perceived loss of cultural resources due to development pressure and neglect, and several noted heritage tourism and interpretive programming, using place-based approaches, as important ways to meet educational and economic revitalization goals.

Changing Practice and Needs of Historic Preservation

Through all avenues for public input, participants noted the high – and rising – costs of historic preservation, coupled with the challenges of finding appropriate tradespeople and contractors and (to a lesser extent) materials. Incentive programs can be difficult to access, and many participants noted that current federal, state, and local incentives are not sufficient to subsidize the cost of preservation relative to new construction. While participants widely understood the value and benefits of rehabilitating and restoring historic properties, property stewards and developers, in particular, voiced concerns about strict interpretations of the Secretary of the Interior's <u>Standards for Rehabilitation</u> – the federal standards for what constitutes the appropriate treatment of historic properties – for local regulatory purposes and incentive programs at all levels. (Some practitioners felt that the interpretation of the Standards, in response to this kind of pushback, have already become too watered down; these comments were, however, in the minority.) Several participants commented that historic preservation should help meet skyrocketing needs for affordable housing or, at the very least, not hinder efforts.

There is an ongoing concern about a lack of diversity among practitioners, along with calls – including from current students – for more engagement, like paid internships, for young people who may be interested in pursuing historic preservation and related fields professionally. One commenter noted referenced <u>The Relevancy Guidebook</u>, a new publication from Landmarks Illinois, which examines historical preservation's current challenges from a nonprofit perspective. Several participants flagged concerns about professional qualifications in the practice, which can severely impact who can participate in cultural heritage fields and carry out grant-funded activities. (NPS has indicated that the Secretary of the Interior's <u>Professional Qualifications Standards</u> are outdated and revisions are planned, but they remain the professional standards for historians, architectural historians, archaeologists, architects, and experts in historic architecture.)

As noted in previous plans, Maryland's cultural resources data can be outdated and has significant gaps, especially related to marginalized and underrepresented communities and more recent historic buildings. (Properties built in 1973 now meet the 50-year threshold for consideration as potentially "historic.") It is

also expensive for individuals and local governments to participate in traditional architectural documentation programs, including the <u>MIHP</u>, maintained by MHT, and the <u>National Register</u>, maintained by NPS. Participants expressed an urgent and ongoing need for state and local agencies to invest in data collection, make systems easier to use, and share data related to cultural resources. Without access to good data, it is difficult to make good planning decisions, and more historic and cultural sites will be lost. Many participants also expressed an interest in using different kinds of data – for example, oral histories – to capture the experiences and histories of marginalized and underrepresented communities. Some expressed a desire to document and protect places of cultural significance that do not meet the criteria for the National Register and noted that there is no easy way to do this, at least within traditional documentation and preservation programs.

In many ways, this feedback received during the planning process mirrors national conversations about historic preservation standards, policies, and programs. For example, the documentation discussions dovetail with a recent <u>report</u> released by the National Conference of State Historic Preservation Officers (NCSHPO) that examines how we recognize our historic places, with particular attention to the National Register. Many local historic preservation commissions (HPCs) allow greater flexibility in alterations than state and federal incentive programs; this can help meet local community needs but also creates confusion for developers and property owners. NPS has responded in part by recently issuing <u>new guidance</u> about the use of substitute materials on historic properties. The federal Advisory Council on Historic Preservation issued a <u>recent policy statement</u> on climate change and historic preservation, both of which promote expanded guidance and flexibility in federal preservation standards to meet goals in these areas. Conversations about these preservation policy issues are continuing to evolve.

Federal and state agencies also acknowledge that outdated systems can create barriers to use and access. Over the course of the last statewide preservation plan, both NPS and MHT have introduced online submissions for tax credit programs, MHT has created a digital process for project review submissions called "e106," and NPS has introduced electronic National Register submissions. Over the course of the last statewide preservation plan, both NPS and MHT have introduced online submissions for tax credit programs, and NPS has introduced electronic National Register submissions. Through the NCSHPO, MHT is participating in these broader conversations, and we expect that policy changes will continue to be proposed and discussed within the timeframe of this plan; however, it is difficult to anticipate how far-reaching these proposals might be.

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Historic Cemeteries

Throughout the planning process, participants voiced concerns about the lack of data and resources available to help preserve and protect Maryland's historic cemeteries. This issue also connects to historic preservation policies, in that cemeteries are typically not eligible for inclusion in the National Register, which can limit their protection and eligibility for incentives. They exist in a gray area between historic properties, archaeological sites, and cultural landscapes, despite being important places of cultural memory. As such, documentation of historic cemeteries is uneven throughout Maryland; there is no standard for documentation or single repository of information. Development pressures throughout the state and climate change, particularly sea-level rise on the Eastern Shore, imminently threaten some of these cherished sites. In 2022, MHT and MCAAHC collaborated on a <u>report</u> to the Chairmen of the Senate Budget and Taxation Committee and House Appropriations Committee of the Maryland General Assembly, which outlined challenges facing Maryland's historic African American cemeteries and proposed recommendations. Issues outlined in the report, which overlapped heavily with feedback received during the planning process, included:

- lack of maintenance and missing grave markers;
- missing and deteriorated burial records;
- unknown or inaccurate cemetery boundaries and grave locations;
- best practice guidance needed for locating unmarked cemeteries;
- unknown or contested ownership;
- · cemetery locational data unknown or inaccessible;
- statutory and regulatory weaknesses in cemetery protection;
- · desecration and disturbance are rarely prosecuted; and
- issues of public interest and engagement, including public access, lack of funding for interpretation and memorialization, and lack of education, training, and networking.

While African American cemeteries are among the most vulnerable of Maryland's historic cemeteries and need special attention, the issues and recommendations made in the report are applicable to all historic cemeteries. For these reasons, we have proposed that this plan's key objectives for cemeteries should be consistent with the 2022 report.

Urgent Need for Expanded Technical Assistance, Capacity Building, & Collaboration

As mentioned previously, many participants in the planning process indicated a breakdown of network and connections through pandemic and its aftermath. The need for networking, capacity building, and collaboration – which had been raised in previous statewide preservation plans – had only become exacerbated in the last few years. While staff turnover at some organizations provided fresh energy, it often came with a loss of institutional

knowledge and established relationships. As a result, we received many requests for public and private sector partners to make more technical assistance, training, and networking opportunities available both locally and at the statewide level. Many participants expressed that they need help to understand the resources available, especially from different agencies and programs for funding and research related to cultural heritage. Some noted that time and transportation costs for travel from the Eastern Shore, Southern Maryland, and Western Maryland to the central part of the state, where more resources are located, can be insurmountable for smaller and community-led organizations.

In particular, participants noted that local advocacy nonprofits, which campaign to preserve historic places, seemed to have disappeared from the landscape, and those that remained did not know where to turn for support. Community-led organizations, which sometimes engage in specific cultural heritage projects, often rely heavily or exclusively on volunteers. In some cases, Maryland's heritage areas have developed the capacity to serve as regional umbrellas for various groups engaged in preservation, archaeology, and cultural heritage, but this service is uneven across the state. Groups of practitioners – including the staff of museums and cultural institutions, local preservation planners, and lay advocates for preservation – expressed a desire for both regional and statewide information exchange, among peers. Participants requested a mix of virtual and in-person opportunities to support accessibility needs, as well as special support for all-volunteer organizations and organizations led by and serving Black, Indigenous, and marginalized communities.

Climate Change and Sustainability

In comparison to previous planning years, participants seemed much more attuned to concerns about climate change and its impacts on historic and cultural properties, especially participants working and living on the Eastern Shore. In particular, participants raised concerns about cemeteries and archaeological sites, as well as vulnerable sites connected to Black and Indigenous communities that are imminently threatened by sea-level rise. Participants also noted that heritage-related events and educational programming, as well as the fundraising events needed to sustain organizations, are increasingly threatened by severe weather events.

This feedback dovetails with MHT's observation that requests from local governments have also increased over the last three-five years, asking for more assistance in hazard mitigation and climate adaptation, and we expect this to continue. Unfortunately, MHT no longer has funding to support dedicated assistance to local governments and partners on this issue.

MARYLAND CLIMATE ADAPTATION AND RESILIENCE FRAMEWORK RECOMMENDATIONS 2021-2030

In 2020, the Maryland Commission on Climate Change's Commission's Adaptation and Resiliency Working Group was charged with updating the state's adaptation plan and developing a framework for action on climate change over the next 10 years, specifically in vulnerable and under-served communities. The Maryland Climate Adaptation and Resilience Framework Recommendations: 2021-2030 establishes the vision, goals, strategies, and activities that will guide the next decade of adaptation implementation across the state. Although historic properties are not called out for specific action, the Framework reinforces the importance of cultural heritage in considering climate impacts, the role of arts and culture in climate communications and resilience, and the relationship of natural and cultural systems threatened by climate change.

GUIDELINES ON FLOOD ADAPTATION FOR REHABILITATING HISTORIC BUILDINGS

In 2021, in response to the challenge of meeting both climate adaptation and historic preservation goals, NPS issued <u>Guidelines on Flood Adaptation for</u> <u>Rehabilitating Historic Buildings</u>, to in an effort to help project managers and planners make historic properties more resilient to flooding risk while meeting the Secretary of the Interior's <u>Standards for</u> <u>Rehabilitation</u>. Practitioners in Maryland may also wish to consult MHT's 2018 <u>Flood Mitigation Guide:</u> <u>Maryland's Historic Buildings</u> and <u>Planning for</u> <u>Maryland's Flood-Prone Archeological Resources</u>, released in 2019, which together give an overview of the threats presented by sea-level rise, riverine flooding, and increased precipitation, while presenting different planning approaches and opportunities.

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A DECADE OF FUNDING PROGRESS

The period covered by *PreserveMaryland* and *PreserveMaryland II* (2013-2023) saw important increases to state investment in historic preservation and cultural heritage, including funding increases for the Maryland Heritage Areas Program (from \$3 million to \$6 million annually) and the African American Heritage Preservation Program (\$1 million to \$5 million annually), the creation of a new small commercial tax credit (\$2 million annually), and increased appropriations for competitive commercial tax credit (up to \$20 million).

During this time, MHT also improved its financial incentive programs to make it easier for applicants by:

- migrating its grants programs to a fully online system;
- accepting tax credit applications digitally;
- streamlining applications and procedures;
- streamlining financial requirements and reporting;
- reducing match requirements, where possible;
- implementing a process for e-signatures; and
- streamlining grant agreements and processes.

These changes have greatly reduced the turnaround time from award notification to receipt of funds and alleviated burdens on funding recipients. For *Heritage2031*, MHT will continue to improve efficiency and accessibility (Goal 4) to the extent possible, working within available resources and the guiding legislation and statutory requirements of each program. The Moore-Miller Administration has flagged climate change as an urgent priority to be addressed and has created new capacity at the state level to purse the administration's aggressive climate goals. Over the next eight years, it is possible that more assistance may become available for communities grappling with cultural heritage and climate change.

We heard a broad recognition of the value of historic preservation in sustainable development, particularly in fostering walkable communities, promoting investment in existing communities over sprawl, and keeping materials out of landfills. However, some participants voiced concerns about the ability of historic preservation to support the energy infrastructure needed to meet state and federal climate goals (e.g., solar panel installation on homes, the development of large-scale renewable facilities on the landscape, and electric vehicle infrastructure). We anticipate that this conversation and approaches will continue to evolve on the federal, state, and local levels, and MHT and its partners will need to track developments and help communicate best practices throughout the state.

Accessibility of Public and Private Programs

As in previous statewide preservation plans, participants challenged federal, state, and local programs to do everything possible to increase ease of use and accessibility, especially to sources of funding for historic preservation, archaeology, and cultural heritage. They noted capacity limitations for many groups in even applying for funding and incentives, much the less administration of those funds to state (and to a lesser extent, federal) standards. Several participants requested a quick turnaround to receive funds, once approved, and that state agencies be more open to making funds available upfront versus dispensing funding as reimbursements, both of which (slower processing and reimbursements) privilege higher-capacity organizations with more access to cash. Similarly, tax credits, which are received following a project's completion, privilege property owners and developers who can absorb the initial outlay. In a few cases, participants noted that funding requirements to convey historic preservation easements identified the following gaps in public and private funding programs:

- Operational support;
- · Communications and marketing support;
- More support for research and documentation, including but not limited to architectural documentation;
- · Increased and more flexible emergency funding;
- Museums that are not in heritage areas; and
- Museum-specific needs, such as collections.

MHT, its sister agencies, and partner nonprofits widely recognize the need to increase program accessibility, particularly to be responsive to the needs of underrepresented and marginalized communities. In practice, this will require new and substantial investment in outreach, personnel, systems for implementation (for example, staff liaisons to develop relationships, training in cultural competencies, new software and software training, dedicated staff to assist applicants who need more help). MHT has embarked on a Board-led Justice/Equity/Diversity/Inclusion effort to examine its own programs and impacts; over the course of the last plan, MHAA completed phase one of an equity assessment to improve equitable grantmaking. Some measures can and will be undertaken with existing resources; however, in many cases, additional investment will be necessary to respond to the needs identified. In other cases, existing regulations and policies exist that create barriers to access.

