

Little Hoover Commission
925 L Street, Suite 805
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June 26, 2012

To the Commission,

I am submitting the following comments as a private citizen concerned with the trajectory that State Parks has moved in over the last 20 years. During that 20 years I have had the privilege of working for State Parks, so my comments are based upon my personal experiences while tasked with the responsibility to protect and preserve the cultural legacy that exists throughout our State Parks. That said, what I express here are my personal opinions.

Statement of the Problem

I believe that the focus over the last 20 years within State Parks has shifted away from the protection and preservation of its natural and cultural resources and the interpretation of and education about those resources to law enforcement, public safety, and recreation. Law enforcement personnel have now assumed most positions vested with making the major decisions with regard to all aspects of park management and, I do not believe that they, as a group, have the appropriate background to be in such total control of areas that are not their expertise. Subject matter specialists are marginalized in many Districts and they no longer have direct advisory capacities with the decision makers. This has resulted in poor decisions in many areas, and in some cases damage to resources.

Coupled with the above is a deterioration in an understanding and support for the values and intent envisioned for State Parks as an entity when it was established. State Parks were meant to be different from city parks, amusement parks, and entertainment venues, and it states that in the laws that were established and that govern our Park System. Wholesale reuse of buildings, development of social event venues, and innovative revenue generation will not be the salvation of State Parks, and could be the beginning of their demise without thoughtful planning. I support reuse of historic buildings through three of the established treatments approved by the Secretary of the Interior – preservation, rehabilitation, and restoration – what I support is the planning that must accompany these treatments to achieve the revenue generation that is so needed in Parks, yet retain the historic integrity that is essential to passing these resources down to the next and succeeding generations.

At the meeting on June 26th some committee members could not understand why the adaptive reuse program was so 'modest or tentative' and wondered why State Parks did not have comprehensive databases of their holdings, both collections and historic buildings. While the answers the committee received for their questions were truth, it didn't go far enough to explain that background of why these conditions exist. The Legislature and other decision makers in Sacramento must understand that years and years of cutting budgets and limiting hiring for State Parks has resulted in today's non-sustainable situation. When I started at the Archaeology Lab in 1992 I was support staff for 17 archaeologists and historians. Today there are two full time archaeologists and no support staff at the Archaeology Lab. How can anyone

expect the same level of service? Stewardship requires regular assessment of historic buildings, archaeological sites, and cultural landscapes (industry standard is every five years). With reductions to less than 10 historians and less than 30 archaeologists statewide the task of keeping track of what we have, evaluating them for significance, and recommending treatments to preserve them has become all but impossible. State Parks is currently unable to meet its stewardship responsibilities for its cultural resources – and not because the employees don't care (NOTE: there were eight archaeologists and one historian from State Parks in the audience on June 26th) – but rather because there are too few of us and we do work dictated by other people's agendas (i.e., District Superintendents, ADA, maintenance, Planning, others). With the lack of trained professional cultural personnel, the people who are working on developing programs for revenue generation and other programs aren't educated in historic preservation. This omission continues a pattern of calling in the cultural staff at the last moment and setting them up as the 'obstructionists' who 'stop projects'. This may sound petty, but this is the way the system is currently geared and despite the fact that cultural people work hard to be cooperative, helpful, professional, and effective – one cannot contribute if one isn't at the table.

I believe that there has been a lack of will to support an operational cultural stewardship program within the department. Today, State Parks still lacks a Cultural Resources Chapter in its Departmental Operations Manual – a guiding policy document – although such a chapter has been written and ready for over a year and a half. Today, no one can tell you how much it costs to maintain, operate and steward a historic structure, archaeological deposit, or historic landscape because cultural resources have been kept out of our maintenance tracking system – although a business plan to integrate this core function has been in place since 2008. The stewardship costs associated with cultural resources is today invisible and unaddressed within park management because of this failing to recognize the tasks, funding, and personnel needs to meet even minimal standards of stewardship. This is seen in the fact that State Parks has, in the last ten years, been on the Top Ten Most Endangered Historic Resources List put out by the National Trust for Historic Preservation. A situation that was not taken seriously by the Administration on the 14th floor, but rather passed off as an unimportant assessment. State Parks is currently failing in its stewardship responsibilities for cultural resources. Most of its historic buildings are suffering from what is called "benign neglect". This is a situation where there isn't money to do what is essential, so what is done, if anything, is a 'band-aid solution' that hopes to hold it together until funding is available.

On today's agenda there are seven people slated to speak to cultural issues within State Parks. Of those one, Blaine Lamb, is directly involved with the management of all cultural resources within the System, and is what we call a 'cultural specialist'. Another, Mr. Jackman, is an authority on one park within the system, and is also a cultural specialist. Where were the people who know Parks the best? My biggest concern with the agenda is the wording that seems to imply that the only concerns are with State Historic Parks, museum collections, historic sites (with a narrow definition of the last 300 years), and archives. Additionally, it appears that the Commission may believe that we have resources that can be treated as was the Presidio in San Francisco, which just isn't true. The closest we may come would be Angel Island, or maybe Columbia or Old Town Sacramento – in that these are some of the few parks that have multiple historic buildings. What hasn't been considered is the very real problems of

access (Angel Island and Columbia) and the very, very poor condition of many of the buildings (due to benign neglect) that would make such a large scale project all but impossible for within these parks. Historic preservation cannot be approached from a cookie-cutter approach – with historic resources, each is unique and will dictate what can and should be done – if you have preservation in mind.

California has been home to people for at least the last 15,000 years and the majority of our 'historic sites' are associated with the California Native people who have made this land their home. A large and important portion of the artifacts that are within our museum collections come from the Native cultures that have lived throughout California during this extended time period. The archaeological sites, sacred sites, artifacts, ethnographic information, and a large percentage of our archives are part of, or devoted to, this prehistoric record. State Parks has had a consultation policy in place since 2007, but since the responsibility is vested with the District Superintendent, the department still struggles, throughout most of the state, to implement the full intent of the policy. I was gratified to see not one, but three representatives from California tribes at the Commission meeting. I was disappointed to see the boredom and inattention on the faces of some of the commission members. These Native people have legal rights that we are mandated to acknowledge and consider – and in many cases, we aren't doing what is necessary today to include them and protect their heritage. The narrow focus of this commission is an example of that statement.

Solutions to the Problem

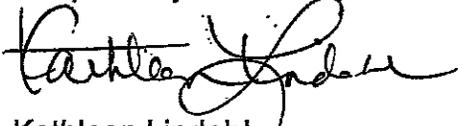
1. Acknowledge and restructure the management of State Parks to replace some of the management positions with people who have resource protection, interpretation & education, and business management backgrounds. Such a broad spectrum of experience will improve management decisions and allow for creative solutions that are cooperative to address the complex needs of most of our park units.
2. Revive and reinforce the values for which State Parks were formed and acquired. Bring the emphasis back to equalization of all core functions. Stop the marginalization of specialists. Reinvigorate our traditional values and intent of State Parks and what it is to provide to the public – preservation to the 7th Generation. Integrate that into the modern world that has needs that were unanticipated in the early 1900s. Ensure that we have events that are appropriate to the venue and that are done in a manner that preserves the integrity of the resources. We can make parks profitable without sacrificing the resources through thoughtful planning. What is happening now is fly-by-the-seat-of-your-pants response – and this can only hurt and damage our natural and cultural resource values.
3. Review and accept the Cultural Chapter for the Department Operations Manual.
4. Integrate cultural resource maintenance tasks into the Asset Management Program so that cultural resources and their necessary tasks can be tracked, quantified, and qualified for personnel management and assignment.
5. Encourage and make possible the integration of natural, cultural, and interpretation personnel with other qualified personnel in all areas of park management – facilities maintenance, project and construction managers, planning and law enforcement personnel. This will go a long way to ensuring that the Secretary of the Interior's

Standards and Treatments are understood and applied as needed and validating their professional guidance so it is respected and responded to.

6. The above will require a change in the infrastructure and thinking of State Parks and will require the hiring of more cultural resource personnel. Today, less than half of our Districts have cultural staff. The Service Centers, who are supposed to pick up cultural duties for Districts without staff, are understaffed and struggling to meet expectations. AHM Division, with state wide responsibilities, has limited ability to respond to regular work requests let alone emergency requests. We are trying to maintain, but at great cost to existing personnel. (For example, there are three natural specialists to every one cultural specialist within the system. Interpreters and curators also outnumber historians and archaeologists.) This may seem self-serving – but there is currently no career ladder for historians or archaeologists within State Parks. With many retirements coming in the next five years, without replacement personnel and strength in the Districts, the program, even such as it is, will not be able to survive.

I am very concerned and worried about the future of State Parks as a whole, and it's cultural program specifically. I would welcome the opportunity to work with any task force to find ways to improve our stewardship and service to the public.

Respectfully submitted,



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