



Life's better outside.®

April 11, 2018

Mr. Ken Levine
Director
Sunset Advisory Commission
P.O. Box 13066
Austin, Texas 78711

Commissioners

Ralph H. Duggins
Chairman
Fort Worth

S. Reed Morian
Vice-Chairman
Houston

T. Dan Friedkin
Houston

Anna B. Galo
Laredo

Bill Jones
Austin

Jeanne W. Latimer
San Antonio

James H. Lee
Houston

Dick Scott
Wimberley

Kelcy L. Warren
Dallas

Lee M. Bass
Chairman-Emeritus
Fort Worth

Carter P. Smith
Executive Director

Re: Sunset Review of Texas Historical Commission Issues 1 and 2; Appendices F, G.

Dear Mr. ^{Ken} Levine:

Thank you for the letter dated March 28, 2018, providing an opportunity for the Texas Parks and Wildlife Department (TPWD) to review and comment on *Sunset Advisory Commission Staff Report on the Texas Historical Commission* (the report). As noted in your letter, information contained in Issues 1 and 2 of the report could affect TPWD.

Like the Texas Historical Commission (THC), the State Preservation Board (SPB), the General Land Office (GLO), and many local governments, nonprofit organizations and academic institutions across the state, TPWD is committed to preserving, protecting and telling the stories of the rich history of the State of Texas.

Issue 1 – The State’s Disjointed Approach to Managing Its Historic Sites Limits Best Use of State Resources

Issue 1 and Recommendation 1.1 focuses on the need for a comprehensive historic sites plan. Specifically, Recommendation 1.1. would “[d]irect THC to establish a working group with representation from necessary stakeholders to begin to develop a statewide historic sites master plan.” The recommendation would further direct THC to present a proposal for development of the master plan to the Sunset Commission by December 10, 2018.

- ***Inclusion of Other Entities that Steward Historic Properties.*** TPWD recognizes and appreciates the value of enhanced coordination among entities that steward historic state resources. TPWD also appreciates the acknowledgement that local and private historic site owners also contribute to telling the history of Texas. As a result, if such a plan is intended to be truly comprehensive, TPWD recommends that the working group charged with developing the plan include other entities, such as local governments, nonprofit organizations and academic institutions that steward historic facilities, in addition to THC, TPWD, SPB, and GLO. We believe this would engender greater community “buy-in” to the plan and hence improve the chances of its successful implementation.

With regard to TPWD properties, TPWD recommends that the plan recognize that historic interpretation occurs at facilities other than sites that are specifically referred to as State Historic Sites. TPWD’s State Parks Division stewards a total of 95 sites, consisting of State Parks, State Natural Areas, State Historic Sites, and sites designated as State Parks and Historic Sites. Invariably, each of these sites contain archeological deposits, historical buildings, culturally significant places, or other cultural resources that require management and provide an opportunity for providing

public education and building awareness and appreciation of the past. TPWD manages resources and carries out historic interpretation activities throughout the State Parks system, regardless of site classification.

For example, at Palo Duro Canyon State Park TPWD interpreters tell the story of how the canyon has been used and inhabited for about 12,000 years by a variety of cultures, including Clovis and Folsom peoples, Comanche and Kiowa; the story of the Battle of Palo Duro during the Red River War between the U.S. Army and southern Plains Indians; and, the story of the historic Goodnight ranch. Similarly, Guadalupe River State Park tells the story of immigration pressures from prehistoric cultures, to Kiowa-Apache and Comanche tribes, to German migrants, to suburban sprawl. Another example are the 29 state parks sites that were developed in whole or in part by the Civilian Conservation Corps (CCC) in the 1930s. The story of the CCC is important throughout the state parks system.

In addition, sites under the jurisdiction of a local governments, academic institutions, and nongovernmental entities also tell important pieces of Texas' rich history. For example, as manager of the Zaragoza Birthplace and one of three Goliad Massacre sites, TPWD works with Goliad County (the owner and manager of the Goliad Massacre Monument), and with the Catholic Diocese of Victoria (the owner and manager of the presidio), as well as THC (the owner and manager of the Fannin Battleground) to tell the shared story of the Goliad Massacre, including a reenactment event that occurs each year.

- ***Professional Facilitation and Funding.*** TPWD recommends that development of the proposal, as well as development of the master plan be professionally facilitated by a third-party facilitator to ensure that all parties are able to fully participate. Also, depending on the level of detail required in developing the proposal, and the number of entities involved, achieving a December 2018 deadline may require additional resources. Similarly, TPWD recommends that the master planning process be supported by sufficient funding to ensure that the effort is sustained to prevent the plan from becoming outdated and stale.

Issue 2 - The State's Approach to Managing Historic Sites and Associated Collections Is Inefficient and Wasteful

Issue 2 recommends greater sharing of resources among state entities that steward historic properties. However, the discussion primarily focuses on TPWD and THC. TPWD would recommend that this discussion be expanded to address SPB and GLO, and possibly other entities that steward historic properties.

- ***Disposition of Curatorial Items.*** Recommendations 2.1, 2.3, and 2.4 address the disposition of items held at curatorial facilities. TPWD understands and appreciates the need to address the disposition of curatorial items and return funds generated by such disposition to the respective agency. TPWD would welcome the opportunity to discuss whether the Texas Facilities Commission (TFC) process or some other process is the most appropriate and efficient for disposing of these items.

- **Memorandum of Understanding (MOU) Regarding Management, Procurement, Contracting and Storage.** Recommendation 2.5 calls for TPWD and THC to enter into an MOU to address certain listed items, including the sharing by TPWD of certain land management equipment and staff. TPWD understands and appreciates the value of cooperation and collaboration among sister agencies.
 - *Scope.* As noted above, TPWD requests that this recommendation be expanded to address SPB and GLO resources, and possibly other entities that steward historic properties.
 - *Costs.* TPWD recognizes that there are areas in which sharing of resources can be accomplished without additional costs to either agency. In other instances, however, further discussion of possible costs and funding needs associated with the recommendation would need to be explored to account for, among other things, limited staff resources; costs associated with acquisition, maintenance and replacement of equipment; the fact that few THC sites are located in the immediate vicinity of TPWD sites; and, the fact that some of the needs may occur during the busy summer months for both THC and TPWD sites.
- **Professional Facilitation and Funding.** Recommendation 2.5 would require that the recommended MOU be developed by February 1, 2019. As with Recommendation 1.1 regarding master planning, TPWD recommends that the development of the MOU be professionally facilitated by a third-party facilitator to ensure compliance with this deadline. Also, since the MOU deadline occurs during the regular session of the 86th Texas Legislature and prior to enactment of the General Appropriations Act for the 2020-2021 biennium, TPWD recommends that any obligations contained in the MOU that would increase costs to the parties to the MOU be contingent upon funding for this effort.

We want to thank you again for this opportunity to review the report. TPWD looks forward to working with the Sunset Commission and the Texas Legislature as these issues progress.

Sincerely,



Carter Smith
Executive Director

CS:AB:dh

cc: Ms. Ann Bright, Chief Operating Officer
Mr. Brent Leisure, State Parks Division Director