



Midpeninsula Regional
Open Space District

R-19-117
Meeting 19-22
August 28, 2019

STUDY SESSION AGENDA ITEM 1

AGENDA ITEM

Historic Structures Policies, Guidelines, and Practices

GENERAL MANAGER'S RECOMMENDATION

Review and discuss existing Midpeninsula Regional Open Space District policies, guidelines, and practices related to the disposition of historic structures. No Board action required.

SUMMARY

At its April 24, 2019 meeting, the Board of Directors (Board) deliberated on the proposed stabilization treatments of several historic structures. At this meeting, the Board expressed a desire to engage in a comprehensive policy discussion on historic structures. In response, the General Manager has worked with staff to schedule a series of study sessions on historic structures with the objective of confirming final Board policy direction on the management of these resources. The August 28, 2019 study session begins the process of clarifying the Midpeninsula Regional Open Space District's (District) current historic resources policies and practices. Staff will present pertinent information around three main areas: (1) summarizing at a very high level the regulatory environment pertaining to historic structures; (2) summarizing existing District policies, guidelines and procedures; and (3) providing an overview of current structures on District lands and current structures disposition process. A second study session in late 2019 will provide a more in-depth training provided by a qualified historic resources consultant of historic resources definitions, rules, regulations, and requirements. A third study session in early 2020 will focus on partner agency policies and processes to understand standard best practices of similar organizations. These study sessions aim to fully inform the Board about existing historic structures regulations and requirements, and standard policies, procedures and best practices to determine whether any Board policy changes are warranted. These study session presentations have no immediate fiscal impact.

DISCUSSION

Overview of Federal, State, and Local Regulatory Setting

District historic structures are subject to federal, state, and local regulations and policies. Below is a broad overview of federal, state, and local review processes. These processes and related requirements will be discussed in more detail at a future study session/training session that will be provided with the assistance of an historic resources expert in late 2019.

Federal Review

The National Parks Service administers the National Historic Preservation Act of 1966 (Act). The Act created the National Register of Historic Places (NRHP), the list of National Historic Landmarks, and the State Historic Preservation Offices that administer the Act at the state level. The Act requires federal agencies to evaluate the impact of all *federally funded or federally permitted* projects on historic properties through a process known as Section 106 Review. A structure is measured against four specific criteria and its level of remaining integrity to determine whether a structure is significant and would be eligible for listing on the NRHP. Treatment of historic structures and properties follow standards issued by the Secretary of the Interior. The four criteria are listed below:

- Associated with an event of historical significance;
- Associated with a person of historical significance;
- Represents distinctive characteristics of a type, period, or method of installation or possesses high artistic values; or
- Has yielded or may likely yield important cultural resource information.

State Review

California State Parks' Office of Historic Preservation (OHP) administers federally and state mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's archaeological and historical resources. OHP works with California's city and county governments to help integrate historic preservation into their community planning and development policies, plans, and activities. OHP also reviews and comments on federally sponsored projects pursuant to Section 106 of the National Historic Preservation Act, and comments on local and state projects pursuant to the California Environmental Quality Act (CEQA).

Local Review

With the Federal and State guidance cited above, counties and cities may further develop their own plans, ordinances, or advisory bodies related to historic resources. Counties and cities also develop General Plans that provide further guidance on historic resources. In recent years, the District has had experience working with the Santa Clara County Historical Heritage Commission on the landmark alteration permit for the Alma College Cultural Landscape Plan, and the San Mateo County Historic Advisory Board for the removal and clean-up of the structures in lower La Honda Creek Open Space Preserve.

District Policies and Guidelines Related to Historic Structures

While Federal and State regulations determine the historic status of a structure and local government agencies have permit oversight for demolition or repair/alterations, the District has identified additional considerations when evaluating the use and management of historic structures in preserves. Historic structures are referenced in several District policies and plans listed here in the order by date of first adoption. District policies are subject to change at the direction of the Board.

- **Board Policy 4.01** Open Space Use and Management Planning Process (*adopted 1977, last revised 2013*)
- **Board Policy 4.02** Improvements to District Lands (*adopted 1978, last revised 2017*)

- **Resource Management Policies** (*adopted 1994, last revised 2012*)
- **Basic Policy** (*adopted 1999, last revised 2008*)
- **Service Plan for the Coastal Annexation Area** (*adopted 2004*)
- **Board Policy 4.09** Factors to Consider for Structures Disposition (*adopted 2012, last revised 2017*)
- **Open Space Vision Plan** (*adopted 2014*)
- **Board Policy 4.08** Construction and Demolition Waste Diversion (*adopted 2015*)

Relevant sections of these documents are summarized below, with more detail or complete texts provided in Attachments 1, 2, and 3. The Service Plan and EIR establish the policies, guidelines, and practices by which the District purchases and manages lands in the San Mateo County coastside area, including the management of structures on agricultural lands. The Basic Policy, Resource Management Policies, Vision Plan, and Board policies provide staff direction on the identification and treatment of historic structures.

Definitions

The Glossary in the Resource Management Policies defines historic resources as a subcategory of “cultural resource,” as “*a structure, landscape feature, archaeological site, or other artifact of human activity in the past during prehistoric or historic periods.*”

“Historic” is further defined as “*dating from periods post-dating the use of written historical documents. In the American West...all periods after European exploration and colonization of the region.*”

The policy defines “historical rehabilitation” as one of the options for treatment of a historic structure, using a description from the *Secretary of the Interior’s Standards for Treatment of Historic Properties*:

The act or process of making possible a compatible use for a property through repair, alterations and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

Basic Policy

The Basic Policy provides general guidance on the treatment of historic structures, highlighting the District’s need for partnerships and outside assistance to manage and restore these resources:

Historic structures and sites will be considered for protection by the District where they are associated with lands acquired for overall open space values. Due to the high cost of evaluating, managing, and restoring such facilities, the District depends on grant assistance, public-private partnerships, and outside assistance to support these activities.

Service Plan for the Coastal Annexation Area

The Service Plan provides guidance on how to address historic structures in the San Mateo coastside area. Guideline G.6.30 states that structures should be evaluated by a qualified consultant to determine historic significance and eligibility for listing. If a structure is determined to be historic/eligible, rehabilitation or relocation may be required, and any new structures built in the vicinity must be consistent with the historic character. The Service Plan

also requires mitigation of short-term construction impacts to historic structures adjacent to or within other project areas, including mitigation of dust, noise, and vibration impacts.

Resource Management Policies

The Resource Management Policies define the policies and practices that set the framework and general guidance for protecting and managing resources on District lands. Historic resources are primarily addressed in Policy VIII, Cultural Resource Management. The policy's stated goal is to "enhance, protect, and promote conservation of cultural resources", including historic resources. The policy states that such resources should be included in management plans and in a GIS inventory, and that the District should support public access to, interpretation of, and research of historic sites. They should also be assessed by a qualified consultant for eligibility for listing in national, state, or local registers. If a resource is determined to be eligible for listing, the feasibility of preserving the resource should be assessed.

Open Space Vision Plan

The Vision Plan discusses overarching themes and goals that guide the District's work. The Natural, Cultural, and Scenic Landscapes theme includes goals related to cultural resources.

Theme: Natural, Cultural, and Scenic Landscapes

Subtheme: Steward Many Cultures

- Protect at-risk culturally significant resources and promote their responsible stewardship
- Cultivate partnerships that preserve and/or enhance cultural resources
- Increase interpretation of cultural resources

Subtheme: Sense of Place

- Maintain a sense of place by protecting and increasing access to locally significant, iconic natural or cultural features
- Preserve the scenic backdrop and designated scenic corridors, emphasizing the view from major roadways and parklands
- Preserve the character and scenic qualities of the coast and rural areas

Board Policies

Board Policy 4.01 *Open Space Use and Management Planning Process* describes a systematic approach to the development of management plans and outlines the importance of comprehensive use and management plans, which include major structure disposition. Goals of management include "continued preservation of natural, historical and cultural resources." This policy refers to Board Policy 4.02 (see below) for the disposition process.

Board Policy 4.02 *Improvements on District Lands* guides the preparation of recommended actions concerning structures and improvements to inform the Board's decision. The policy states that existing structures and other improvements on District lands are potential resources and as such will be evaluated for potential retention and will be addressed in site planning documents. The policy goes on to indicate that structures or improvements should be evaluated for historical significance and considered for retention at acquisition, during site planning, and when required renovations exceed \$200,000 or the value of the structure. All management actions must be complementary to the objectives of the *Basic Policy* and take into consideration

the structure's compatibility with open space and proposed uses, its historic value, the potential financial burden of retention, and the factors described in Board Policy 4.09 *Factors to Consider for Structures Disposition* (see below). Policy 4.02 also refers to the development of a specific Historic Structures policy that will provide a detailed process for evaluating and determining the disposition of potentially historic structures.

Board Policy 4.08 *Construction and Demolition Waste Diversion* establishes capital project guidelines for contracted construction and demolition projects to divert waste from landfills. It states that prior to demolition or construction, a Historic Resource Evaluation must be performed for any structure more than 50 years old or containing known historical resources to confirm that the structure is not historically significant.

Board Policy 4.09 *Factors to Consider for Structures Disposition* provides a framework to assist the Board with considering the disposition of a structure and to provide the public with an understanding of factors used in the decision-making process. The policy details a dozen factors that may influence a decision to alter, remove, or retain/rehabilitate a structure. These key factors are listed below:

- Board-adopted policies
- Open space compatibility
- Historic and educational value
- Opportunities for partnerships
- Potential short- and long-term financial costs
- Proposed and potential uses
- Public sentiment and input
- Regional importance or value
- Consistency with District mission
- Impacts to District resources
- Visitor experience
- Condition.

District Process for Structure Disposition

The properties the District has purchased and continues to purchase often come with existing structures such as houses, barns, or other types of built infrastructure. Some structures are over 50 years old and some could be determined to be historic resources after a qualified historic expert evaluation. Historic structures present a unique challenge for the District in balancing cultural resources value with the District's focus on stewardship of open space and the natural environment. Historic structures may sometimes offer opportunities for interpretation, education, and/or reuse. They may also attract financial and/or operational support from other agencies, organizations, or individuals interested in historic preservation. On other occasions, the cost or difficulty of restoring, preserving, and managing a structure may outweigh the potential benefits of its reuse or retention and require grant assistance or outside partnerships.

For each structure the District acquires, a decision must be made on its disposition: to retain in its existing state, actively preserve/rehabilitate, or otherwise alter or remove it. This generally occurs during the pre-acquisition assessment (due diligence) phase and development of a Preliminary Use and Management Plan (PUMP) that is prepared for each new potential purchase. Existing conditions and improvements are evaluated, and a property's near- and long-term uses are assessed. Staff present recommendations to the Board to demolish or retain structures as part of the Board's consideration of the PUMP. When the pre-acquisition timeline is short, structures are complex, or long term uses need to be evaluated in a larger context, such as a Site Specific Plan or Preserve Plan, a decision on the disposition (retention, active preservation/rehabilitation

or demolition) of a structure may be deferred until the District completes additional evaluations and a more comprehensive planning process. Whether slated for demolition or repair, structures thought to be or known to be 50 years old or more undergo a historic structures evaluation by a qualified consultant, where staff present the findings and subsequent recommendations to the Board for consideration and final Board action. Through these processes (Attachment 4), final disposition of structures is considered and approved by the Board.

Structures on District Lands

The District has inherited hundreds of structures as part of property purchases over the decades. These include a wide variety of structures beyond houses and barns, such as outbuildings, sheds, lean-tos, communication towers, stables, winery, butler buildings, corrals, carports/garages, and many types of rural or agricultural accessory structures. Following implementation of the new Enterprise GIS platform in 2017, the District currently has several hundred structures recorded in the District's GIS database. Although the data is not fully comprehensive, staff continues to actively populate and update information in the GIS on an on-going basis.

The District continues to use existing policies, guidelines, and plans to evaluate structures. Board decisions are made on a case by case basis as projects with structures are brought to the Board for a recommended action. Once a final decision is made by the Board, structure-related projects are included in the annual Capital Improvement and Action Plans (CIAP). For example, this year the CIAP includes the Lyson Structures Disposition at Montebello (demolition), an action that was approved by the Board at the time of the property purchase. The CIAP also includes the Redwood Cabin Stabilization and Assessment (retention), an action approved by the Board as part of the 2012 La Honda Creek Master Plan.

The August 28 study session is an opportunity for the Board to better understand District policies and general information about the regulatory setting. The next study session, led by an outside expert historic resources consultant, will provide more detail about the federal, state, and local regulatory setting. A third study session in 2020 will provide the Board with information on how other similar agencies address historic structures. These three study sessions will help inform the Board's direction on any changes to District policies regarding the use and management of historic structures.

FISCAL IMPACT

The informational Historic Structures Policies, Guidelines, and Practices Study Session presentation has no immediate fiscal impact.

BOARD COMMITTEE REVIEW

This item is being presented to the full Board to inform future Board direction.

PUBLIC NOTICE

Public notice was provided as required by the Brown Act.

CEQA COMPLIANCE

Review of existing policies, guidelines, and practices is not a project subject to the California Environmental Quality Act.

NEXT STEPS

A second study session in late 2019 will provide in-depth training about the definitions, regulatory requirements, and regulations affecting historic structures. A third study session in early 2020 will focus on outside agency policies, processes, and best practices.

Attachments

1. Summary of District Policies with References to Historic Structures
2. Board Policy 4.02 Improvements on District Lands
3. Board Policy 4.09 Factors to Consider for Structure Disposition
4. General Process for Structures Disposition

Responsible Department Head:

Jane Mark, AICP, Planning Manager

Prepared by:

Sophie Christel, Planner I, Planning

Tina Hugg, Senior Planner, Planning

Contact person:

Tina Hugg, Senior Planner, Planning



Attachment I: General Process for Structures Disposition

Acquisition Due Diligence

- Structure condition assessment (including lead/asbestos/insects/rodents)
- Biological assessments (bats, birds, woodrats, etc.)
- Historic evaluation if potentially historic and purchase time allows
- Existing use

Disposition Analysis

- Structure condition, historic status, policy review, and use discussion
- Staff preliminary determination on structure's suitability for District use and long-term disposition – retain or demolish
 - Policy 4.02 Improvements on District Lands
 - Policy 4.09 Factors to consider for structures disposition

Board Decision

- Review of staff determination and Board Committee recommendation
- Award of contract (\$50K+) – structure repair/rehabilitation or demolition
- Approval of General Manager recommendation

Attachment 2

Summary of District Policies with References to Historic Structures

Historic structures are mentioned or referenced in several of the Midpeninsula Regional Open Space District's (District) Board-approved policies, guidelines, or plans as listed below. Sections related to historic structures from each of the following documents are excerpted below. Policies provided in their entirety are noted.

Policy documents:

- Basic Policy (first adopted 1999, last updated 2008)
- Resource Management Policies (first adopted 2014)
- Board Policy 4.01 Open Space Use and Management Planning Process (first adopted 1977, last updated 2017)
- Board Policy 4.02 Improvements to District Lands (first adopted 1978, last updated 2017) – **see Attachment 2 for entire policy**
- Board Policy 4.09 Factors to Consider for Structures Disposition (first adopted 2012, last updated 2017) – **see Attachment 3 for entire policy**

Plans:

- Service Plan for the Coastal Annexation Area and accompanying Environmental Impact Report (2003)
- Vision Plan (2014)

Basic Policy

- **Recreational Use and Improvements**
Section c. Special Use facilities, (i.e. nature centers, historic structures, picnic tables, or backpack camps), and Special Use activities (i.e. large recreation events, hang gliding, or off-leash dog areas), are considered on a case by case basis. In some cases Special Use activities may require a permit. These types of uses may be allowed when they do not monopolize significant areas of natural land, do not significantly impact natural or aesthetic resources, and provide benefits such as environmental education, heritage resource protection, or public enjoyment and appreciation of nature. The cost of management and exposure to liability of these types of facilities and activities may be a factor in deciding whether to permit them on District lands.
- **Cultural Resources**
Section e. Historic structures and sites will be considered for protection by the District where they are associated with lands acquired for overall open space values. Due to the high cost of evaluating, managing, and restoring such facilities, the District depends on grant assistance, public-private partnerships, and outside assistance to support these activities. Sites are evaluated for archaeological resources prior to any new use or improvement which might impact the site. Archaeological resources are evaluated, protected, and made known to the public as appropriate to ensure their preservation.

Resource Management Policies

I. District Resource Management Program *(page 1)*

Need for Resource Management Policies

“Cultural resource management consists of identifying and evaluating and protecting archeological sites and cultural landscapes.” *(page 3)*

Mission Statement for Resource Management

Strategy 2 Provide an effective interdisciplinary program to protect and enhance natural and cultural resources. This program should include planning, interpretation, research, protection, maintenance, and monitoring practices.

Strategy 9 Increase public knowledge, understanding, and appreciation of the natural and cultural resources of the preserves, and support for their conservation.

VII. Scenic and Aesthetic Resources *(page 35)*

Background

“In some cases, preserving a significant scenic or historic landscape may involve managing it to actually prevent natural succession, for example, without intervention; a shallow pond may gradually fill in and become a meadow or open grassland.” *(page 35)*

Policy SA-2 Maintain significant landscapes or features that were formerly maintained by natural processes.

- Control encroaching vegetation where it adversely affects significant scenic, historic or habitat resources (See Vegetation Management, Cultural Resources, and Integrated Pest Management policies).

VII. Cultural Resource Management *(page 38)*

Background

“There are remains from each of these periods on District lands, including Native American village sites and bedrock mortars, barns and other ranching features, orchards, wineries, historic homes, sawmills, mines, historic roads and trails, and outdoor recreational sites. As time passes, more recent periods of California’s history become historically significant. As such, some 20th century sites such as World War II and Cold War military sites are now considered historically significant resources throughout California. Collectively, these sites, structures, features, and artifacts comprise the cultural resources of the District.” *(page 39)*

“The development pressures from which the District protects open space land also threaten its associated historic and prehistoric structures, cultural landscapes, and archaeological sites. The preservation of open space land in the peninsula’s greenbelt provides the opportunity for the

District to protect and interpret the rural history of the Santa Cruz Mountains and San Francisco Bay for the benefit of present visitors and future generations.” (page 39)

“When the District acquires land with historic structures, the structures often have suffered years of neglect and are at risk of collapse. In these cases, it can be very expensive to rehabilitate and maintain these structures, many of which have already lost significant resource integrity. It is sometimes necessary to remove dilapidated historic structures due to public safety concerns and the prohibitive expense of historical rehabilitation. The District has adopted “Policies Regarding Improvements on District Lands” to provide a public process used to assess and determine whether District structures and improvements are cultural resources, and how they can most appropriately be managed. The District has successfully completed a number of important historic preservation projects, often with assistance from granting agencies and/or public/private partnerships. Cultivating relationships with historic preservation groups, research organizations, and knowledgeable local residents, including Native American groups, will allow the District to pursue new opportunities to preserve cultural resources and protect remnants of the peninsula’s heritage for present and future Bay Area residents. The District serves communities of diverse ethnic heritage, who seek a wide variety of experiences in District preserves. To the extent that these practices can be accommodated with minimal impact to the natural and cultural resources, they should be encouraged and accommodated wherever feasible.” (page 40)

Regulatory Context

“The California Environmental Quality Act (CEQA) (Guideline 15064.5, Public Resources Code 21038.2) states that a substantial adverse change to the significance of a historical resource or a unique archaeological resource must be treated as a significant effect on the environment in a project’s environmental review.” (page 40)

“Section 106 of the National Historic Preservation Act of 1966 requires consideration of impacts to historic resources on federal lands or projects requiring federal permits. Likewise, any project that requires review under the National Environmental Policy Act of 1969 must consider impacts to cultural resources.” (page 41)

“The Service Plan recognized the unique value of cultural resources in the San Mateo County coastal area and established Cultural Resource Policies to preserve cultural resources in the Coastal Annexation Area. The Policies and Implementation Measures established in this Cultural RMPs are consistent with the Cultural Resource Policies in the Service Plan.” (page 41)

“The Cultural RMPs is intended to be consistent with and to supplement the District’s “Policies Regarding Improvements on District Lands.” The purpose of this policy is to formalize and enhance the District’s cultural resource management practices for the long-term stewardship of the District’s significant historical and archaeological sites.” (page 41)

Cultural Resource Goals, Policies, and Implementation Measures

Goal CR- Identify, protect, preserve, and interpret cultural resources for the benefit of present and future generations.

Policy CR-1 Maintain an inventory of cultural resources on District preserves.

- Inventory and assess cultural resources throughout the District, including prehistoric and historic archaeological sites, structures, and cultural landscape features. The Cultural Resource Inventory should include a Geographic Information Systems database; however, access to this inventory must be restricted to District staff and qualified professionals, to the extent allowed by law to protect sites from looting and vandalism.
- Record cultural resources in the District's Cultural Resource Inventory when purchasing new property and perform research on previous uses of the property. Examples of research activities include performing a records search with the Northwest Information Center and consulting historic preservation organizations, previous residents, and descendants to gather local historical information.
- Complete archaeological site records for known unrecorded sites on District land and file reports with the Northwest Information Center.

Policy CR-2 Address cultural resources in the development of preserve use and management plans.

- Consult the Cultural Resource Inventory when planning projects that may have an impact on cultural resources in the project area.
- Conduct appropriate reconnaissance measures, such as research or archaeological survey, early in the planning process for trail construction, maintenance activities, or other projects that entail ground disturbance in an area of known archaeological sensitivity. Monitor construction activities when appropriate.
- Locate facilities, such as trails, staging areas, and new structures, to avoid loss or degradation of historically or archaeologically significant resources wherever possible. If not possible to avoid, minimize impacts, for example by: capping site, recording important features and/or artifacts, relocating structures, or data recovery excavation.
- Include stakeholder groups when developing plans for the management of historically or archaeologically significant resources. Consult with descendent communities such as Native American and other ethnic groups when developing plans for the management of historically or archaeologically significant resources related to their heritage.
- Assess the significance, integrity, and feasibility of preservation of historic structures when developing Preserve Use and Management Plans or Master Plans. If a structure is determined to be eligible for the California Register of Historic Resources, assess feasibility of preserving the resource.

Policy CR-3 Protect cultural resources from disturbance to the maximum extent feasible.

- Wherever possible and appropriate, preserve historical resources and archaeological sites in situ.
- Prohibit looting, vandalism, and unauthorized removal of cultural resources and associated artifacts from District preserves.
- Implement security measures such as protective fencing and patrol-ing to reduce vulnerability of the resources due to vandalism and looting.
- Develop security protocols to limit availability and distribution of geographic information for cultural resources to protect sites from looting and vandalism.
- Prohibit District sale, purchase, or commercial trade of individual archaeological artifacts.
- Develop and follow guidelines for reporting, protecting and recording archaeological sites and features in the event of unexpected discovery.
- Provide District staff with basic training to identify and protect cultural resources.
- Assess existing operations within areas of known archaeological sensitivity to protect and preserve cultural resources.
- Require that all archaeological investigations or research activities that have the potential to physically significantly impact archaeological resources are carried out by qualified archaeologists, and that a technical report for each project is provided to the District following excavation

Policy CR-4 Preserve and maintain cultural resources wherever feasible.

- Actively pursue grant assistance from local, state, federal, and other programs to supplement District funds to implement historic preservation projects for historically and archaeologically significant resources.
- Seek partnerships with private or non-profit groups to aid in the restoration, management, and use of historic structures.
- Assess the condition, identify needed repairs, and prepare maintenance plans for significant high priority historic structures as funds allow.
- Assess the eligibility of cultural resources for nomination on local registers, the California Register of Historic Resources, and the National Register of Historic Places. Consider nomination to registers for which a resource is determined eligible.

- Catalog artifacts associated with sites on District lands to prevent deterioration and to document the site and location where the artifacts were recovered. Consider curating artifacts in danger of deterioration. Maintain a cataloging system to preserve artifacts' contextual information and storage locations. Where appropriate, coordinate with other agencies and organizations to assist in long-term curation of District collections.
- Develop and follow guidelines and procedures governing loans of artifacts to other agencies and organizations.
- Develop and follow guidelines for reporting, protecting and recording archaeological sites and features in the event of unexpected discovery.

Policy CR-5 Provide public access and educational programs to interpret historical and archaeological resources. (See PI-1).

- Provide controlled public access to historical and archaeological sites where appropriate, considering other public access resource constraints and resource protection.
- Allow appropriate uses of cultural resources by descendent communities.
- Seek input from descendent communities, such as Native American and other ethnic groups, when planning public access and educational programs that interpret cultural resources related to their heritage.
- When developing partnerships for the use and management of historic structures, plan for public access to the structures where appropriate while minimizing impact to the structures and respecting the needs of building occupants.
- Provide interpretive materials such as signage or brochures for self-guided hikes to inform visitors about the history of District lands and the San Francisco Bay Area. Develop locations to display artifacts for public benefit.
- Encourage, utilize, and support historical research by docents and volunteers.
- Provide training opportunities for docents to aid them in the development of docent-led tours of historic and archaeological sites and landscapes.
- Facilitate school field trips of historic and archaeological sites and cultivate other opportunities to work with educational groups to interpret cultural resources on District preserves.
- Support historical and archaeological research conducted by District-approved, qualified cultural resource professionals on District lands.

Policy CR-6 Preserve District institutional history.

- Preserve documents and artifacts important to the history of the District.

X. Public Interpretation and Environmental Education *(page 51)*

Background

“Increasing public knowledge and appreciation of the preserves' natural and cultural resources will improve support for their conservation.”

Interpretation and Education Goals, Policies, and Implementation Measures

Goal PI- Increase public knowledge, understanding, and appreciation of the natural and cultural resources of the preserves, and support for their conservation. *(page 52)*

Policy PI-1 Provide interpretive programming, facilities, and materials (See CR-5, GM-6 and GM-7).

- Develop appropriate and timely projects and plans to support natural and cultural resource interpretive opportunities that are guided by recommendations and priorities in the District's Interpretive Systems Plan (ISP).

XI. Grazing Management *(page 55)*

Grazing Management Goals, Policies, and Implementation Measures

Policy GM-6 Provide information to the public about the region's rural agricultural heritage. (See PI-1).

- Install display boards and give presentations highlighting historical and educational facts about ranching families and industry at appropriate sites.

XV. Wildland Fire Management *(page 78)*

Wildland Fire Management Goal, Policies, and Implementation Measures

Policy GM-6 Implement necessary fire and fuel management practices to protect public health and safety, protect natural resources, and to reduce the impacts of wildland fire. *(page 81)*

- Prepare wildland fire management plans for District lands that address, at a minimum, public safety, District staff and firefighter safety, District infrastructure including residences and roads, natural resource protection (particularly **special status** species), **cultural resources**, and vegetation management for fire protection and **fire behavior** and hazardous fuels modification.

XVII. Glossary (page 90)

Archaeological site – A site in which physical evidence of past prehistoric or historic human activity has been preserved. (Cultural Resources)

Artifacts – Objects created by humans or modified by human activity. (Cultural Resources)

Cultural Landscape – A landscape modified by past human activity or otherwise holding historical or prehistoric cultural importance. (Cultural Resources, Public Interpretation, Wildland Fire)

Cultural Resource – A structure, landscape feature, archaeological site, or other artifact of human activity in the past during prehistoric or historic periods. (Cultural Resources)

Cultural Resource Inventory – The District’s inventory of cultural re-sources on District preserves. Information in this inventory may include site locations, descriptions, and photographs, as well as historical information on individual sites and preserves. (Cultural Resources)

Data Recovery – Research and recording techniques such as the excavation of archaeological sites or recording of architectural features prior to site disturbance. Data recovery is a common mitigation measure for projects that may have a substantial adverse impact on a significant cultural resource. (Cultural Resources)

Historic – Dating from periods post-dating the use of written historical documents. In the American West, the historic period is generally considered to refer to all periods after European exploration and colonization of the region. (Water Resources, Scenic and Aesthetic, Cultural Resources, Forest Management, Ecological Succession, Wildland Fire)

Historical Rehabilitation – “The act or process of making possible a compatible use for a property through repair, alterations and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” (Definition from Secretary of the Interior’s Standards for Treatment of Historic Properties) (Cultural Resources)

In Situ – “In place;” at the site of original deposition or discovery. (Cultural Resources)

Interpretation – A communication method that aims to reveal meanings, connections, and relationships by firsthand experience, and by illustrative media. (Cultural Resources, Public Interpretation, Forest Management, Wildland Fire)

Native – Those elements of the natural world occurring within an ecosystem prior to disturbance from an outside event. (Vegetation Management, Wildlife Management, Integrated Pest Management, Water Resources, Geology and Soils, Scenic and Aesthetic, Cultural Resources, Research and Collection, Grazing Management, Ecological Succession, Habitat Connectivity, Wildland Fire)

Natural – Plant, animal, and microorganism life, native materials, and eco-system processes that make up the physical world. (Vegetation Management, Wildlife Management, Integrated Pest Management, Water Resources, Geology and Soils, Scenic and Aesthetic, Cultural Resources,

Research and Collection, Public Interpretation, Grazing Management, Forest Management, Ecological Succession, Habitat Connectivity, Wildland Fire)

Northwest Information Center – A clearing house for historical and archaeological information associated with the California Historical Resources Information System, which houses historical documents, site reports and other research pertaining to cultural resources in Northwest California. (Cultural Resources)

Open Space – Land and water areas that remain in a natural state and are minimally developed, and may include compatible agriculture uses. (Wildlife Management, Water Resources, Geology and Soils, Scenic and Aesthetic, Cultural Resources, Public Interpretation, Grazing Management, Forest Management, Ecological Succession, Habitat Connectivity, Wildland Fire)

Prehistoric – Dating from periods of human activity prior to the use of written history. In the American West, prehistory generally refers to all periods before European colonization of the region. (Cultural Resources)

Resource Integrity – The extent to which character-defining features of a resource or its research potential remain intact. (Cultural Resources)

Resource Management – Management of both natural and cultural resources. Natural resource management generally consists of protecting, restoring, enhancing and monitoring native vegetation and wildlife, and monitoring and protecting the quality of geological and hydrological conditions. Cultural resource management consists of identifying and evaluating archeological sites and cultural landscapes. (Vegetation Management, Geology and Soils, Research and Collection, Public Interpretation, Grazing Management, Forest Management, Wildland Fire)

Resources – Plants, animals, water, soil, terrain, geologic formations, historic, scenic, and cultural features. (Vegetation Management, Wildlife Management, Integrated Pest Management, Water Resources, Geology and Soils, Scenic and Aesthetic, Cultural Resources, Research and Collection, Public Interpretation, Grazing Management, Forest Management, Habitat Connectivity, Wildland Fire)

Restoration – The process of returning land that has been degraded and disturbed into functional habitat. (Vegetation Management, Integrated Pest Management, Water Resources, Research and Collection, Forest Management, Wildland Fire)

Restore – To bring back to or put back into a former or original state. (Vegetation Management, Geology and Soils, Public Interpretation, Grazing Management, Forest Management, Ecological Succession, Habitat Connectivity, Wildland Fire)

Significance – A measure of the importance of an archaeological or historical resource. The threshold of significance determines eligibility for state and national registers and whether a cultural resource must be considered in NEPA and CEQA documents related to a project. The criteria detailed in CEQA by which significance (See Appendix A) is determined differ for historic and archaeological resources but include the resource's age, integrity, association with important individuals or trends in local history, and potential to provide important information about the past. (Cultural Resources)

Policy 4.01 Open Space Use and Management Planning Process

A. Purpose and Scope of Planning Process

“MROSD lands are managed to promote the continued preservation of their natural, historical and cultural resources, and at the same time provide compatible public recreation, environmental education, and agricultural use where possible.

The Open Space Use and Management Planning Process has been established to address these management goals.”

B. Description of Planning Process

“The Planning Process is comprised of five planning categories, which allow for a systematic approach to the development of management plans. The categories relate to various stages of site planning a preserve may be subject to during its course of development and use.”

1. Preliminary Use and Management Plans

Preliminary Use and Management Plans consist of use and management recommendations developed and approved at the time of acquisition or approval of a license or management agreement. These plans normally represent a status quo approach to use and management. Emphasis of the plan is typically on securing the site, specifying immediate site management needs, and establishing a timeline for providing general public access. Limited public use, such as docent hikes or neighbor use/permit use, may occur while the site undergoes post-acquisition planning, depending on site constraints.”

3. Comprehensive Use and Management Plan

The Comprehensive Use and Management Plan is a detailed plan addressing all aspects of use and management. It is prepared for preserves that have the potential for a substantial amount of public use, and/or have other critical land use issues which need attention. The comprehensive plan is based on a resource analysis and public input, and evaluates potential uses as well as cultural and existing uses. It represents both long term (5-15 years) goals and short term (1-5 years) goals with the focus of specific recommendations being the tasks to be completed within five years. The need and approximate timing for preparation of a Comprehensive Use and Management Plan may be determined when considering the Preliminary Use and Management Plan or when the Interim Use and Management Plan is adopted or reviewed.

4. Preserve Master Plan for Improvement, Use and Management

The Preserve Master Plan is very broad in scope and is developed with the intent of providing a guideline for development of a preserve over a term of 1 to 30 years. Compared to the Comprehensive Use and Management Plan, the Preserve Master Plan involves more extensive site analysis, a higher level of public involvement, and in most cases, explores a wider range of improvements, resources, and land uses. The Master Plan is usually designed to be implemented in phases over a long time period. Master Plans are typically prepared for District lands that lend themselves to higher levels of recreational uses, resource issues, agriculture, improvements, and land uses, or have particularly complex planning issues to be resolved. Upon completion, the

Preserve Master Plan serves as a basis for the formulation of change to a preserve's Comprehensive Use and Management Plan, which reflects the more immediate phases of the Master Plan. The Master Plan is intended to be the guiding document when considering amendments to previous Use and Management Plans."

C. Preliminary Use and Management Plan Elements

"The Preliminary Use and Management Plan contains a number of elements that focus on existing conditions and potential uses of the site. The elements typically include, but are not limited to:"

"4. Potential Use and Development

A conceptual look at the potential uses, including potential uses of structures and improvements.

5. Site Protection and Immediate Site Needs

These elements pertain to any immediate plans for the lands including limited public access, protection of the site's resources, and insuring public safety."

"c. Structures and Improvements

Discussion of all structural-type improvements including residences, water systems, restrooms, barns, fences and gates. Policies regarding disposition of major structures (i.e., use, sale or demolition) is further addressed in Section E."

D. Major Structures and Improvements

"The disposition of major structures and other improvements is a primary concern throughout the planning process because of their potential resource value or deleterious impact. The process by which structures are disposed of is in accordance with Policies Regarding Improvements on District Lands.

Preliminary use and management recommendations relating to existing structures and improvements will generally maintain the status quo, unless specific factors must be addressed because of negative site impacts or safety hazards requiring mitigation. For structures and improvements being retained during the further planning process, potential use categories will be identified, and a timeline for returning to the Board will be established. When feasible, the next decision point should coincide with the next consideration of the site's Use and Management Plan to ensure that the ultimate disposition is consistent with overall plans for the site.

The Use and Management Plan will establish the parameters for improvements and use of structures that are compatible with all other elements of the plan. The plan will outline the procedure and timeline for the preparation of a specific proposal, whether it is confined to a staff proposal or possibly the solicitation of public proposals. In the case of public solicitation, it is imperative that the parameters are well defined and consistent with open space goals and site plans."

Coastal Service Plan (2004)

THE MISSION FOR THE COASTAL ANNEXATION AREA

The District's mission for the Coastal Annexation Area is: To acquire and preserve in perpetuity open space land and agricultural land of regional significance, protect and restore the natural environment, preserve rural character, encourage viable agricultural use of land resources, and provide opportunities for ecologically sensitive public enjoyment and education. The District will accomplish this mission as a cooperative endeavor with public agencies, non-profit organizations, and individuals with similar goals.

Planning and Development *(page 23)*

“...District lands are managed to promote the long-term preservation of their natural and cultural resources, and at the same time provide low-intensity public recreation, environmental education, and agricultural use where possible....”

- **Guideline G.6.3** Inherent in the preservation of open space resources in the Coastal Annexation Area is the protection of: rare, threatened and endangered plant and animal species; ecological systems; agricultural resources, water quality; visual resources; unique biological resources, including heritage and significant trees; and the unique cultural resources in the Coastal Annexation Area, including historic, archaeological and paleontological resources. Therefore, prior to making any lands available to low-intensity public recreational access, the District shall prepare and adopt a use and management plan, which, includes site-specific resource management and public access components for any lands acquired by the District or managed through contract for other public or private non-profit property owners. All lands acquired by the District within the Coastal Annexation Area will be inventoried to identify and prioritize resource management issues.

- **Guideline G.6.30** The protocol for determining if structures are of historic value is as follows:
 1. The property and building types will be identified and evaluated by a qualified cultural consultant;
 2. The cultural consultant will determine if the structures in question are currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places;
 3. If it is determined that the structures in question are not currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places, a DPR 523 form issued by the California Department of Parks and Recreation (DPR) will be completed by the cultural consultant and the structural and building data sent to a qualified architectural historian;
 4. If it is determined that the structures in question are currently on the California Register of Historic Resources or if the building has been determined to be of historic value, there are two options that would mitigate any impact to the historic values:

- a) Retain and rehabilitate the building, rehabilitate it according to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). New construction near this building should be consistent with its historic character; or
- b) Move the building to a different location on its current parcel or to a different parcel appropriate to its historic character.

(Reference: Mitigation CUL-1a)

- **Implementation Action G.6Q(i)** Short-Term/Construction activities may impact nearby historic properties. These impacts may include dust accumulation on building facades, and increased noise and vibration from construction equipment. Construction period impacts could be mitigated to a less-than-significant level by implementing the following mitigation measures:

3. Cleaning of the adjacent historic buildings may be necessary after construction activities to prevent long-term damage to the building fabric. The need for cleaning shall be determined by a qualified Historic Architect, shall follow the standards set by the Secretary of the Interior, and shall be completed in consultation with the Historic Architect.
4. A structural engineer shall inspect the buildings prior to construction to determine if the noise and vibration anticipated during construction will affect the buildings framework and fabric. The report, with any recommendations and mitigation measures, should be reviewed by a qualified Historic Architect

(Reference: Mitigation CUL-1a)

EXISTING IMPROVEMENTS *(page 42)*

The District is most interested in obtaining and/or managing “open space” properties. These are properties that typically have few or very limited existing improvements. Municipal sewer or water services are not normally sought by the District unless already available to the property.

Should the District acquire lands that contain existing structures, these structures may be maintained and improved for uses such as staff or caretaker housing or for rental to others. Rental preference would be provided to other open space or recreation providers, such as the San Mateo County Parks and Recreation Department, and other public service workers, including teachers, where use of such facilities would benefit public recreation or open space programs and the community. Structures may or may not be retained depending on their condition and potential for compatible use. If retained, structures would likely not be expanded. Dilapidated or dangerous structures and other hazardous structures not of historic or scenic value may be demolished.

Vision Plan (2014)

Enriched Experiences: *(page 22)*

Learning about and appreciating the local environment, as well as connecting people with nature and with each other.

Theme: **Knowledge, Understanding, and Appreciation**

Goals:

- Remember and honor community heritage and past ways of life through activities, programming, and projects
- Interpret how natural and cultural resources relate to people's current lives
- Increase preserve-specific interpretation projects and programs that emphasize the protection of natural and cultural resources

Natural, Cultural, and Scenic Landscapes: *(page 23)*

Conserving the area's scenery and rich history and providing places for escape and quiet enjoyment.

Theme: **Sense of Place**

Goals:

- Maintain a sense of place by protecting and increasing access to locally significant, iconic natural or cultural features
- Preserve the scenic backdrop and designated scenic corridors, emphasizing the view from major roadways and parklands
- Preserve the character and scenic qualities of the coast and rural areas

Theme: **Steward Many Cultures**

Goals:

- Protect immediately at-risk, culturally significant resources and promote their responsible stewardship
- Promote partnerships that preserve and/or enhance cultural resources
- Increase interpretation of cultural resources

###

Midpeninsula Regional Open Space District

Board Policy Manual

Improvements on District Lands	Policy 4.02 Chapter 4 – Acquisition & Maintenance of District Lands
Effective Date: 3/24/16	Revised Date: 2/08/17
Prior Versions: 2/22/78, 3/23/83, 10/10/84, 7/25/07, 11/13/13, 3/23/16	

Purpose: Open space lands purchased by the District often have structures and other improvements of varying condition, usefulness and value. Some of these improvements are appropriate to the open space around them, and others are not. As use of District lands increases, there will be additional pressure on the District to construct new facilities such as visitor use buildings, parking lots, housing, and field offices. Since there are many costs involved with the maintenance, patrol, and liability of structures, it is important that the District establish a policy for the use, construction and/or removal of structures on District lands. Information on specific structures and their use, potential uses and final disposition will be found in the site planning documents. The following policy statements are intended as a guide for staff in the preparation of recommended actions concerning structures and improvements to inform the Board’s decision.

A. Definitions.

For the purpose of these policies, improvements include but are not limited to all improvements such as buildings, houses, barns, . visitor-serving and sanitary facilities, utility structures, communication towers, dams, water storage facilities, fences, gates, corrals, roads, trails and parking lots.

B. Policy Statement.

All structures and other improvements existing on District lands at the time of acquisition are potential resources and as such will be considered for retention and will be addressed in site planning documents. The District will retain, renovate or build a structure or other improvement only if it is complementary to the objectives of the District outlined in the *Basic Policy*. Important considerations in the decision to retain or build an improvement will be its compatibility with the open space character of the site, its potential financial burden to the District in terms of liability and management, historic value, and its proposed use. Further considerations are outlined in the *Factors to Consider for Structures Disposition* board policy 4.09. Improvements that don’t meet the criteria for retention will be removed as soon as practicable.

The *Construction and Demolition Waste Diversion* board policy (4.08) provides guidelines for the disposition of materials resulting from an improvement- construction or demolition project.

Structures or improvements should be evaluated at the time of acquisition, during the site planning process and when renovations in excess of \$200,000 or that exceed the value of the structure are required.

The Board will review and approve the demolition of residential structures of any size, any structure in excess of 1,500 square feet, and any structure determined to be historically significant. The Board must also approve the construction of a residential structure of any size or any structure in excess of 1,500 square feet.

The General Manager or his/her designee may authorize the demolition of any structure that does not meet the guidelines above as well as any structure that has had a major structural failure such as a collapsed wall or roof. The General Manager or his /her designee may approve the construction of any non-residential structure under 1,500 square feet on a case by case basis. In cases of particular public interest or that are controversial, the General Manager may bring the decision to the Board for final disposition.

In other than emergency situations, public notice will be given to the degree specified in the *Open Space Use and Management Planning Process* board policy 4.02 and the *Public Notification* board policy 1.09 before any decision is made by the Board on the disposition of a structure or improvement.

C. Discussion.

(1) Improvements Used for Site Protection, Management, and Stewardship:

(e.g., Field Office, Employee Residence, Agricultural Labor Residences, Equipment and Water Storage Facilities, Outbuildings, Corrals, Fences and Gates)

If it is deemed necessary or desirable to have a field office or employee residence in order to properly care for a site and to accomplish the District's land management, resource management and stewardship goals, the decision to use an existing structure or to build a new structure should be based on this policy and *Factors to Consider for Structures Disposition* board policy 4.09.

As the District acquires agricultural properties, housing is needed for agricultural lease holders and their agricultural workers. Residences on District agricultural properties should be evaluated as potential housing for agricultural labor.

Some improvements, including but not limited to outbuildings, corrals, fences, gates, equipment and water storage facilities may be required for the proper maintenance and protection of a site. Such improvements will be constructed and/or maintained as required.

(2) Improvements for Public Utilization of the Site:

(e.g., Education and Recreation Facilities, Restrooms, Drinking Water, Trails, Roads, Bridges and parking Lots)

One of the District's principal roles is providing low intensity recreational use of its lands. Improvements such as trails and parking lots will be considered as part of the site planning process. Improvements which have potential for more intensive recreational, environmental, historic, or educational use will also be considered for retention or construction; however, the willingness of other agencies or partners to bear any major costs of construction and/or management will be an important consideration.

Facilities required for the health and safety of the public will be constructed and maintained as required. In emergency cases, the staff will have discretion for immediate mitigation of hazards.

(3) Improvements which Contribute to the Character of the Site:

(e.g., Buildings with Unique Historical or Architectural merit, Barns, Sheds and Fences)

In order for the Board to determine the historical, cultural or architectural significance of a structure, the District will notify and consult such agencies as specified in the Open Space Use and Management Planning Process board policy 4.01.

As an aid to this determination, the District will conduct and maintain a survey of significant structures within the planning area. When the District considers acquisition of a site which includes a structure or structures which are listed on the National Register for Historic Places or are clearly eligible for inclusion on that register, the District has a special responsibility to seek some means to protect these structures. An important consideration in the decision to retain such structures will be the availability of special funding programs or resources from other public agencies, private organizations or individuals for the costs of their restoration, maintenance and operation. In extraordinary situations involving structures of exceptional historical or architectural merit, when other resources are not available, the District will either exclude the structures from its acquisition or accept the responsibility to protect and preserve them for an indefinite period while seeking other means for continued preservation and/or restoration as identified in the historical resources inventory. A Historic Structures policy is currently under development which will provide a detailed process for evaluating and determining the disposition of potentially historic structures.

Some structures associated with agriculture or other former uses of the site can contribute significantly to the site without detracting from its open space character. When economically feasible within the constraints of the land management budget, examples of these structures will be retained, maintained, and when possible put to use.

(4) Improvements for Agriculture and Other Special Uses:

Agricultural use which is consistent with the open space use of a site is encouraged by the District. Improvements for agriculture or other special uses will be retained or constructed as approved by the Board and stated in the site planning documents. In the Coastside Protection Area; leases, use, and improvements shall be consistent with the District's Service Plan Policies.

(5) Improvements as Income Sources:

Improvements intended to be constructed or maintained solely for the purpose of producing revenue will be evaluated on a case-by-case basis by the Board. Structures that do not serve a District purpose as listed in sections C 1-4 may be rented or leased to provide a revenue source for the District. When a structure or improvement is retained for these purposes, it should generally be rented for the fair market value consistent with possible special restrictions due to its location on open space lands, or in accordance with the Housing Policy board policy 4.11 and guidelines approved by the General Manager. Structures that are slated for demolition or are

retained for a future District purpose may be rented temporarily as a means of revenue production.

(6) Leases

The Board of Directors will review and approve leases or licenses which are long term (over one year) and/or involve an anticipated annual income in excess of \$50,000, excluding month-to-month agreements. The General Manager or his/her designee may enter into leases, license agreements, or rental agreements on behalf of the District without specific Board approval if they are:

- (a) In amounts not exceeding \$50,000 anticipated annual income to the District (including in-kind services), and
- (b) No more than one year in duration, or month-to month, and
- (c) Pursuant to a Board adopted planning document, and
- (d) Do not create commitments which go beyond the scope of the Board adopted site planning documents (e.g., extensive tenant improvements which could imply a longer term commitment by the District).

The General Manager will have the discretion to enter into leases specifying either cash or in-kind services or a combination of the two as payment. If in-kind services are being accepted, they will in no circumstance exceed three year's full cash value of the lease, the cash value of the remaining time on the lease, or \$50,000, whichever is less, without Board approval, to preclude the expectation of a continuing relationship.

Midpeninsula Regional Open Space District

Board Policy Manual

Factors to Consider for Structures Disposition	Policy 4.09 Chapter 4 – Acquisition and Maintenance of District Lands
Effective Date: 09/19/2012	Revised Date: 02/08/2017
Prior Versions: 09/19/2012	

Purpose

Disposition of existing structures or the construction of new structures requires, at a minimum, an evaluation of existing conditions, a determination of the structure's value to the District and its constituents, short-term and long-term costs, maintenance, and staffing requirements. These factors provide a framework for discussion to assist the Board with considering the disposition or construction of a structure and to provide the public with an understanding of the factors that normally must be considered as part of the decision-making process.

Policy

Decision Making Factors to Consider for Existing or New Structures	
A.	Board-Adopted District Policies
B.	Compatibility with Open Space Character of the Site
C.	Historic and Educational Value
D.	Partnership Opportunities / Cooperation
E.	Potential Financial Cost, Including Liability and Management
F.	Proposed and Potential Uses
G.	Public Sentiment and Input
H.	Regional Important or Value
I.	Strategic Fit
J.	Tradeoffs and Impacts on District Resources
K.	Visitor Experience
L.	Condition of the Structure

A. Board-Adopted District Policies

The District Board of Directors has adopted various policies to guide day-to-day administration, operation, and management of District Preserves and to lay out the District's objectives and means by which it accomplishes its mission *"to acquire and preserve a regional greenbelt of open space land in perpetuity; protect and restore the natural environment; and provide opportunities for ecologically sensitive public enjoyment and education"*. One factor to consider is whether the structure under review is consistent with Board-adopted policies. The underlined headings B. through K. below were extracted or inferred from existing Board policies and include a brief summary to help lead a discussion of how they might apply to the disposition of District structures.

B. Compatibility with Open Space Character of the Site

Consistent with the board policy 4.02, *Improvements on District Lands*, it is important to consider whether a structure is believed to be compatible with and/or add to the character of the site and its

surrounding landscape. This includes whether the structure provides a sense of place as seen from afar, or whether the structure detracts from the natural surroundings.

C. Historic and Educational Value

The policy, *Improvements on District Lands*, calls for the gathering of information pertaining to the historical, cultural, or architectural significance of a structure. Existing historic-era structures inherited through past purchases or under consideration for purchase require surveys conducted by an expert consultant to evaluate the structure's potential eligibility for listing in the National Register of Historic Places (National Register) and the California Register of Historic Resources (CRHR). As part of this survey, the history and significance of *individual* buildings and structures should be placed in context of any remaining or demolished *larger* facility in order to determine eligibility for listing. Taken together, these assessments would determine historic significance and integrity.

This factor also includes "Educational" value given the high value placed by the public on the educational opportunities that exist for visitors, and especially younger generations, to gain a greater understanding of why a structure exists and its relevance to historic events.

D. Partnership Opportunities/Cooperation

The District's *Basic Policy* includes a commitment to cooperatively engage with other agencies, community organizations, and individuals to preserve open space and to facilitate development and management of recreation facilities and public use. Beyond this, private organizations and entities could also provide cost-sharing and partnership opportunities to retain and/or manage structures. Existing structures may be more attractive to an entity if accessory amenities are already provided or are anticipated, or if a portion of the structural improvements are already completed. The Board may also want to consider the minimum match amount needed for the District to retain a structure. Consideration may be given to a cost-sharing situation where only a portion of the necessary funding to retain a structure is actually obtained by outside sources.

E. Potential Financial Cost, Including Liability and Management

Cost is an important decision-making consideration in either retaining or building a new improvement. Costs may include initial construction costs, one-time renovation costs, ongoing and long-term maintenance and management costs, and eventual demolition costs. Costs should be evaluated by the Board on a case-by-case basis and weighed proportionally with all other factors outlined in this policy.

F. Proposed and Potential Uses

The policy, *Improvements on District Lands*, identifies the structure's proposed use as an important consideration in the decision to retain or remove it. An evaluation of the structural conditions can inform what repairs are necessary and the associated cost to 'repurpose' the structure into an occupied structure for public use. Although it is typically desirable to re-use existing structures, building a new facility that meets current code and/or meets a specific District need may be much more cost effective. Also, consideration should be taken on the remoteness of the structure since location may impede its accessibility and usefulness.

G. Public Sentiment and Input

(District Constituents and Residents Living Outside District Boundaries)

This factor considers input from not only constituents whose property taxes support the District, but also from the larger regional constituency outside the District boundary. The District is divided into seven geographic wards, each represented by an elected Board member for a four-year term. Wards are drawn to divide the population evenly among Board members; in 2010 each Director represented approximately 107,000 constituents (2010 census), or 1/7th of the population residing within the

District boundary, which was approximately 749,000. Wards are redrawn at the conclusion of every national census, or when land is annexed for incorporation as part of the District. It is the responsibility of every Board member to provide representation to his or her individual constituents, and to also integrate the opinions of the larger public that reside outside the drawn boundary, particularly when decisions affect the larger region. It is common for buildings to elicit strong and varied responses from the public and staff since buildings often touch on people's values, personal experiences, memories, and desires. As such, it is important to consider and evaluate each single comment that is received as part of the decision-making process.

H. Regional Importance or Value

Even if a structure cannot be seen from miles away, many buildings hold intangible values associated with memories of past personal experiences, important events, or regional occurrences that affect a wide distribution of people. The Board of Directors will consider this criterion in the context of the District's mission to "...protect and restore the natural environment, and provide opportunities for ecologically sensitive public enjoyment and education." Although some structures may not be deemed eligible for historic listing, the District might consider whether a structure is seen by some members of the public as a historic or cultural symbol, or a visual landmark, for current, former and future residents of the area.

I. Strategic Fit

Strategic Fit ensures that decisions regarding District structures further the District's long-term goals, consistent with the District's Strategic Plan. When viewed in context with the District's other priorities, projects and processes that affect the management of public land, the Board will consider how each particular structure aligns with the District's mission: to acquire land, protect and restore it, and provide public access and education.

In 2011, the Board of Directors approved a Strategic Plan for the District (refer to Report R-11-96) to address the new challenges that the District is facing, including a reduced ability to purchase land while adequately addressing its resource management needs. As a result, consideration of any management decision on a District structure will be evaluated against the guidelines set forth in the Strategic Plan. A determination should be made of how each structure aligns with the Strategic Plan goal of balancing the three-part mission within the context of other current and future projects, as well as its role in fostering partnerships, enhancing public support, and expanding District financial and staffing resources.

J. Tradeoffs and Impacts on District Resources

Every budget cycle brings tough decisions to the District. In an environment of competing resources, some projects move forward while others must be deferred. This requirement to choose one project over another forces the District to compare the values and priorities of each project: for example, the value of completing one highly worthwhile resource management project ahead of another. Any determination about a structure, will also need to be judged against other competing projects, new land purchases, regulatory mandates, etc., in terms of cost, maintenance requirements, and staffing.

K. Visitor Experience

The Mission Statement of the District includes "opportunities for ecologically-sensitive public enjoyment and education". The goal of the Project is aligned with this mission, and consideration should be given as to whether a structure adds value to, or takes away from the visitor experience.

L. Condition of the Structure

One of the most important factors to consider is not derived from Board policy and is simply the condition of the structure. The condition of the structure clearly impacts the costs associated with

stabilization, maintenance and renovation. In addition, many structures are not salvageable due to structural problems, rot and decay. If not addressed either through stabilization repairs, renovation or demolition, many structures can present hazards to District employees and the public including hazardous material exposure, rodent infestations, and structural hazards. Site conditions including the condition of access roads, availability of water, septic and power, and geologic stability play a key role in determining the disposition of existing structures, as well as the appropriateness of new construction.