

**Public Comment Summary: Town of Rosalia Locally Adopted SMP
Ecology Public Comment Period, June 15 – July 15, 2016**

Prepared by WA Dept. of Ecology, July 19, 2016

Local Government Response and Rationale Prepared by the Town of Rosalia August 29, 2016

Comment Number	Comment Topic and Section Number (Citation)	Commenter	Comment	Local Government Response and Rationale
1.	2.2 Shoreline Goals	Washington State Department of Archaeology and Historic Preservation (DAHP)	<p>We recommend a change of wording to the Shoreline Goals for Archaeological, Historical, and Cultural Resources to read like the following:</p> <p>Identify, preserve, protect, and <u>rehabilitate buildings, structures, sites, districts, objects, and landscapes</u> of the shoreline that have historic, cultural, archaeological, scientific, or educational value.</p>	<p>Recommended language change by DAHP is accepted.</p> <p>Rationale: The DAHP suggested language change supports the element’s goal to provide protection and restoration of buildings, sites, and areas having archaeological, historical, cultural, or scientific value or significance. It was not the Town’s intent to omit certain kinds of historical sites.</p> <p>The Town proposes Section 2.2.H be revised to read as follows (deletions struck, additional italicized): Identify, preserve, protect and restore <i>rehabilitate</i> buildings, <i>structures</i>, sites, <i>districts</i>, <i>objects</i>, and <i>landscapes</i>, or areas of the shoreline that have historic, cultural, archeological, scientific, or educational value.</p>
2.	3.3 Shoreline Designations	Washington State Department of Archaeology and Historic Preservation (DAHP)	<p>Thank you for including “...valuable historic and cultural areas...” in the Shoreline Parks designation as stated on page 8 as well as under 3.c. Management Policies. We also recommend including similar language in the other shoreline environment designations in this section since significant archaeological, cultural, and historic resources could be found within those other designations as well.</p>	<p>Comment noted. The Town recognizes that archaeological, cultural and historic resources could be found in any environment designation. However, the purpose of the parks designation is specifically to protect sensitive public protected and sensitive lands, including historic resources. While this is not</p>

				<p>specifically the purpose of the other environment designations such areas would still be protected pursuant to the regulations of Section 4.7 and other provisions of the SMP.</p> <p>The Town feels no change is necessary to the environment designations section to adequately protect historical resources.</p>
3.	4.7 Archaeological, Historical, and Cultural Resources	Washington State Department of Archaeology and Historic Preservation (DAHP)	<p>In section 4.7 Archaeological, Historical, and Cultural Resources, we recommend wording changes to policy 4.7 A. 1. read as follows:</p> <p><u>“Protect archaeological, historic, and cultural resources.”</u></p>	<p>Recommended language change by DAHP is accepted.</p> <p>Rationale: The DAHP suggested language change supports the element’s goal to provide protection and restoration of buildings, sites, and areas having archaeological, historical, cultural, or scientific value or significance.</p> <p>The Town proposes Section 4.7.A.1 be revised to read as follows (deletions struck, additional italicized):</p> <p>Regulate <i>Protect</i> archaeological, historic, and cultural resources.</p>
4.	4.7 Archaeological, Historical, and Cultural Resources	Washington State Department of Archaeology and Historic Preservation (DAHP)	<p>In section 4.7 Archaeological, Historical, and Cultural Resources, we recommend wording changes to policy 4.7 A. 2. read as follows:</p> <p><u>“Due to the limited and irreplaceable nature, destruction of or damage to any site, building, structure, district, object or landscape having historic...”</u></p>	<p>Recommended language change by DAHP is accepted.</p> <p>Rationale: The Town did not intend to limit protection to a particular kind of site by omitting these other terms. The DAHP suggested language change includes a more inclusive set of terms which supports the element’s goal to provide protection and restoration of buildings, sites, and areas having archaeological, historical, cultural, or scientific value or significance.</p>

				<p>The Town proposes Section 4.7.A.2 be revised to read as follows (deletions struck, additional italicized):</p> <p>Due to the limited and irreplaceable nature, destruction of or damage to any site, <i>building, structure, district, object of landscape</i> having historic, cultural, scientific, or educational value as identified by the appropriate authorities, including affected Indian tribes and the Washington State Department of Archaeology and Historic Preservation, should be prevented.</p>
5.	4.7 Archaeological, Historical, and Cultural Resources	Washington State Department of Archaeology and Historic Preservation (DAHP)	On Pg. 20 B.1 Regulations, we recommend removing “iii. The project is within 100 percent culturally-sterile fill” as there is no way to verify this unless the sources of the fill is known and known to be sterile. Fill from other locations may contain archaeological resources and/or human remains.	In some cases the source of the fill may be known and known to be 100 percent sterile. This provision would apply only in those cases. If the source or makeup of the fill is unknown or cannot be documented this provision would not apply. No change is proposed.
6.	4.7 Archaeological, Historical, and Cultural Resources	Washington State Department of Archaeology and Historic Preservation (DAHP)	On Pg. 20 Bc. the wording should be revised to state that “a site inspection of evaluation by a professional archaeologist is required in coordination with affected Tribes and the Department of Archaeology and Historic Preservation (DAHP) prior to initiating disturbance. The resource shall be avoided a mitigation strategy shall be determined. A permit from DAHP may be required under RCW 27.53.”	<p>Recommended language change by DAHP is accepted.</p> <p>Rationale: The DAHP suggested language change clarifies DAHP’s role in in the protection of archaeological and historical resources.</p> <p>The Town proposes Section 4.7.B.1.c be revised to read as follows (deletions struck, additional italicized):</p> <p>If cultural resources are present and ground-disturbance is proposed, then a site inspection or evaluation by a professional archaeologist is required in coordination with affected Tribes <i>and the Department of Archaeology and Historic Preservation (DAHP)</i> prior to initiating</p>

				disturbance. The resource shall be avoided or a mitigation strategy shall be determined. Cost of the evaluation and inspection is the responsibility of the permit applicant. <i>A permit from DAHP may be required under RCW 27.53.</i>
7.	Appendix B: Shoreline Critical Areas Policies and Regulations 5. Fish and Wildlife Habitat Conservation Areas	Washington State Department of Archaeology and Historic Preservation (DAHP)	Thank you for including habitats with “historical or cultural importance” in 5. A. 1. (c) on page B-15	Comment noted.
8.	General	Washington State Department of Archaeology and Historic Preservation (DAHP)	In general the language lacks specificity of process and timelines. We have attached DAHP’s model shoreline language for examples of process and timelines that may provide more clarity and specificity when dealing with cultural resources.	In general the regulations defer to the DAHP Statewide Predictive Model to determine appropriate actions. Additionally, the SMP references two RCWs on Skeletal Human Remains (68.50.645) and Archeological Sites and Resources (27.53). Both state laws provide additional regulation and process in regards to these topics. With the strengthened references to DAHP proposed above, the Town feels no additional changes are necessary to be in compliance with the SMA and fulfill the obligation of protecting archaeological, historical and cultural resources in shoreline jurisdiction.