



**Sent:** Thursday, April 09, 2015 1:28 PM  
**To:** highlands@rpa.org  
**Subject:** RMP comments

Hi (Courtney, wasn't it?) -

I filled out a comment form on your web site, but when it came to the box for comments I couldn't figure out how to move my file into the space, so it's attached to this email. Would you please be good enough to put it in the right place? And would you also please confirm that the job is accomplished? Many thanks.

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## Chapter 4. Goals, Policies and Objectives

The introductory paragraph of Chapter 4 (p. 137) provides an overview of the chapter. There is, however, an essential aspect of resources as described in the Highlands Water Protection and Preservation Act (Act) that is not articulated, and is vital to understanding the policies and objectives therein. A paragraph needs to be added stating that natural and cultural resources coexist in the world, and even though we treat them as separate academic subject areas, that is not how they are found in the Highlands Region or most of world.

In our developed part of the world, both resource types are interdependent, interrelated, inseparable. Therefore, actions that impact natural resources can, and most likely will, also impact cultural resources and vice versa.

Not all resources are of equal significance, and very often the protection of one resource type should take precedence over another. But In order to make a fully informed decision regarding an action that will impact resources, we must always have a complete examination of the spectrum of resource types in a project area or municipality.

Water is of primary importance in the Act, but it is also the clearly stated intent of the Act to protect all natural and cultural resource types generally.

The following is copied from the Act, and should be added as Part 11 of Chapter 4.

*11. The regional master plan shall include, but need not necessarily be limited to:*

*(1) A resource assessment which:*

*(a) determines the amount and type of human development and activity which the ecosystem of the Highlands Region can sustain while still maintaining the overall ecological values thereof, with special reference to surface and ground water quality and supply; contiguous forests and woodlands; endangered and threatened animals, plants, and biotic communities; ecological factors relating to the protection and enhancement of agricultural or horticultural production or activity; air quality; and other appropriate considerations affecting the ecological integrity of the Highlands Region; and*

*(b) includes an assessment of scenic, aesthetic, cultural, historic, open space, farmland, and outdoor recreation resources of the region, together with a determination of overall policies required to maintain and enhance such resources;*

## Chapter 5. Programs

## Part 4. Historic, Cultural, Archaeological, and Scenic Resources (p. 291)

*Goal4A: Protection and Preservation of the Historic, Cultural and Archaeological Resources of the Highlands.*

*Policy 4A1: To maintain and periodically update the Highlands Region Historic and Cultural Resources Inventory*

Several of the objectives under this policy, as currently written, need to be updated. Some additional objectives should be added, if the goal is to be achieved.

*Objective 4A1: To encourage municipalities and counties to include a historic, cultural and archaeological survey(s) as part of the Historic Preservation Plan element of their master plans.*

This crucial objective needs to **require**, not simply **encourage** its implementation.. The costs of such surveys should be eligible for grant funds from the Council. Also, historic and cultural resources age into the program as time passes. Without a current survey, valuable unknown resources can be irrevocably harmed or lost altogether.

*Policy 4A2: To provide a process whereby resources may be nominated, considered and included in the Highlands Historic and Cultural Resource Inventory.*

In objectives 4A2a and 4A2b, it must be clear who is responsible for identifying these objects, buildings, sites, and districts, and who will evaluate their significance and potential eligibility for nomination to the Highlands Historic and Cultural Resource Inventory – a record that does not yet exist. It must also be clear what propels the inventory process in areas or at times where no Council actions are under way.

*Objective 4A3: All development and redevelopment applications shall include submission of a report identifying potential historic, cultural and/or archaeological resources on the subject property or immediately adjacent properties.*

This objective needs to ensure that the person(s) preparing the report have the professional credentials to evaluate these resource types . The plan should specify the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 61). Additionally, the sentence should read **and** immediately adjacent properties, not **or**.

Prepared by Elise Dann, Marion Harris, and Michael Henderson