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Comments: file attached

I have reviewed the Draft Environmental Assessment for the USDA Forest Service's Sandwich Vegetation Management Project and am concerned about what is missing from the analysis described in the draft document.

For more than one hundred years communities of the Tamworth area have used and maintained the hiking trails of the proposed project area. Some of these trails were created in the late-19th century and others were used by Native Americans prior to the Colonial Period. None of this important historical context was discussed in the Draft EA. In the late-19th century, creation, use and appreciation of the trails became an integral part of life in the area, supporting the economy with Summer and Fall tourism, as well as inspiring the cultural creativity of individuals and communities. In Tamworth and Albany, as elsewhere in and near the White Mountains, hiking, and the appreciation of nature that it allows, have been a long-standing intergenerational experience, forming an essential part of community identity and cohesion, as well as encouraging community stability and new settlement. It is common for residents to identify the personal inspiration that comes from hiking on mountain trails of the area as an important reason they remain in or have moved to the area. For this reason, I believe that the hiking trails in the project area should be considered as Traditional Cultural Properties (TCP), a category of cultural resource that is normally considered as part of the analysis for an Environmental Assessment (EA).

The subject document considers the mountain trails only as a kind of recreational option for the community, devoid of any specifics of time or place, as if they could be relocated or stopped and then started without effort or concern. This is despite that fact that the proposed project will, for years, affect the scenic value of and access to a number of these trails. Trees will grow back if forests are managed properly, but valued traditional patterns of life may not. How many traditions have simply been lost in the past few years during our health crisis, just from temporary lack of use? As such it seems apparent that the Service's consideration of a project with the potential to impact access to, and appreciation of, the trails should include an analysis of the historic and cultural importance of the trails to our local communities, with focus on their consideration as Traditional Cultural Properties, per National Park Service's Guidance on Traditional Cultural Properties in its Bulletin 38.

This year the Tamworth History Center ([tamworthhistorycenter.org](http://tamworthhistorycenter.org)) features an exhibit that includes stories, artifacts, and images related to the history of three project-area community outdoor clubs, some of which use and maintain the scenic trails within and around the proposed project area: The Chocorua Mountain Club (Chocorua Mountain Club [mdash] Chocorua Lake Conservancy); The Tamworth Outing Club (Outing Club Home ([tamworthoutingclub.org](http://tamworthoutingclub.org)); and The Wonalancet Outdoor Club ([www.wodc.org](http://www.wodc.org) -Wonalancet Out Door Club). The Chocorua Mountain Club celebrated its hundredth anniversary this year and the other two clubs are well over 75 years old. None of these clubs, many of whose members maintain and use the trails, and would have had valuable insight into the parameters of the proposed action, are referenced in this Draft EA, a significant oversight. Were these clubs contacted? What did they say? The input of these outdoor organizations must be incorporated before moving forward with the FONSI. In addition, the text states that the NH State Historic Preservation Office (SHPO) was contacted and concurred on the no effect determination by the Service. But the correspondence is not included in the Draft EA. In fact, none of the agency correspondence is included as an appendix in the Draft EA, a serious oversight that prevents a competent review of the Draft by the public.

As a cultural resources professional, and as a Tamworth resident with a multi-generational connection to the project area, I would strongly advise that the trails and their related hiking activities be considered as possible Traditional Cultural Properties. Such an analysis would identify these trails as resources whose essential character could be diminished or even lost due to the proposed project. An expanded and re-conceived

Environmental Assessment, and a modified project is needed to assure that these long-used trails receive the consideration they merit.