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Comments:

While I understand the environmental motives of the proposed Tarleton Integrated Resource Project, I am concerned that you have not seriously taken into consideration, or presented adequate documentation for, how you intend to protect cultural resources within the proposed area of potential effects. The proposed actions will include ground disturbance in the form of the creation of roads, movement of heavy equipment, and the removal of trees. As you know, the White Mountains, including the area directly surrounding Lake Tarleton, are overflowing with unique and irreplaceable history and culture. The Forest Service, on its website for the White Mountains, details the diverse resources found within the area and their importance. To quote the website: "the building remains and artifacts now reclaimed by the forest are an important resource in understanding how people lived in the past, and how the forest came into being. They are invaluable, non-renewable, and are protected by law."

The archaeological resources present within the proposed APE may not have been previously recorded and registered with the state, however, the area is known to have a rich, and still very visible, history. Numerous historic homesteads and their stone foundations are known to be scattered throughout the area and are familiar to myself and many of the local residents. While I do not have specific information regarding Native American sites within the project area the White Mountains are well-documented to have been a home to people for thousands of years, extending into the Paleoindian period.

In more recent history the Lake Tarleton Club, which had its primary facilities on the west side of the lake, was a well-known resort in the early 20th century. The club included over 5,000 acres surrounding the lake and town and included a golf course, among many other amenities. The club was known as a "unrestricted" club, which meant that Jewish patrons were allowed to stay at the hotel and use the facilities, unlike many hotels and clubs within the country at the time. A cursory investigation into the club reveals that visitors came from across the country and internationally to vacation at the Lake Tarleton Club. In 1954, the club hosted the sixty-fifth annual convention of the Central Conference of American Rabbis. It is evident Lake Tarleton was a haven for families and individuals who had been outcast from American society in many other parts of the country. This resource alone represents a significant theme in American history and, without question, preserving resources related to the hotel is imperative. I do not see documentation that indicates there has been research into the potential effects to resources associated with the Lake Tarleton Club.

In fact, I cannot find an acknowledgment of the presence or potential for any cultural resources within the APE in the documentation provided in the project records. In the Tarleton Draft Environmental Assessment, it is stated under the National Historic Preservation Act heading that "No historic properties will be affected by the proposed project activities." As is evidenced by the well-known standing remains of historic homesteads, the existence of a major historic resort, and the known presence of human occupation of this area for thousands of years, this statement is distinctly incorrect. The statement should be corrected to a more accurate evaluation that states "No PREVIOUSLY RECORDED historic properties will be affected by the proposed project activities." If that is the case.

Further, the Draft EA states "cultural sites not identified or relocated during survey may be present in project activity areas. If cultural features are encountered during project implementation, work in the area will stop and the Forest Archaeologist will be contacted." It is not my understanding that you are in compliance with Section 106 of the National Historic Preservation Act if you ONLY assess cultural resources after your actions have already adversely impacted the resource. Could you please explain what you mean by this ?

Would you be able to explain in greater detail how you intend to uphold your obligations under Section 106? I apologize if there is already documentation I have overlooked regarding cultural resources within the project folders that have been presented to the public. Based on the documentation I have seen, it does not appear this project has made a reasonable effort to IDENTIFY or PREVENT adverse affects to significant cultural resources within the proposed project area. This alone, in my opinion, signifies that this project is not ready to proceed.

Thank you for your consideration of my comments.