



In Response please reply to:
2018-MLT-43664

December 27, 2018

Rachel Neuenfeldt
Partnerships and Community Engagement
Wayne National Forest - Forest Plan Revision Team
13700 U.S. Highway 33
Nelsonville, OH 45764

Re: Wayne National Forest - Forest Plan Revision Process, Ohio

Dear Ms. Neuenfeldt,

This correspondence offers comments of the Ohio State Historic Preservation Office (SHPO) as part of the engagement of partners and communities for revisions and development of the Forest Plan. The comments of the SHPO are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]), the Forest Service services as the lead federal agency.

The SHPO is hopeful that our comments can be of assistance to the Forest Service in developing a Forest Plan for the Wayne National Forest. The revised Forest Plan will continue to guide the Wayne National Forest (WNF) in meeting forest management goals and objectives.

The SHPO recognizes that the WNF offers many benefits and provides many services, from recreation, camping, hiking, bicycling, ATV courses, horseback riding, fishing, canoeing, boating, clean water, less air pollution, forests, plant life, and animal habitats to lumber production and jobs. We focus here on preservation of heritage resources. When a successful Forest Plan creates a balance where these benefits are each valued and carefully managed then the benefits from the preservation of heritage resources will be enhanced. And, carefully managing preservation will enhance the benefits from and value of other resources.

SHPO comments here focus on the preservation and protection of cultural heritage resources. Our comments are organized according to the Framework presented in the PowerPoint Presentation during the Monday, September 24, 2018, Marietta Community Working Group Orientation:

(1) Ecosystem Service: What is a benefit that the Wayne National Forest provides or could provide?

Preservation, protection, and stewardship of heritage resources. The WNF contains a wealth of archaeological sites and other cultural heritage resources. Astute management of heritage resources offers a broad range of benefits for educational, scientific, and outreach opportunities.

One example of how this benefit serves the people of Ohio is that the thoughtful management of heritage resources gives us the opportunity to learn more about the people who lived in this part of Ohio – as we call it today - at different times during the past.

(2) Socioeconomic Context: How is this benefit valued? What role does it play in the Community? Why is it important to us?

Heritage resources include pre-contact archaeological sites, historic-era archaeological sites, older buildings, structures, and districts, places associated with noteworthy events, and distinctive landscapes created by many different peoples and cultures over a span of more than 15,000 years as they interacted with their natural and cultural environments, created self-identification through patterns of cultural activities, and envisioned their future.

Heritage resource management offers opportunities for increased avenues for tourism; increased abilities to connect visitors to the land; increased opportunities to engage productively with federally-recognized tribes; increased outreach to include new support groups; increased scientific understanding from a long-term view on how the ecosystem works, and the potential to develop better models to plan and carry out successful conservation and preservation initiatives.

(3) Drivers of Change: What sort of factors and stressors have affected our ability to manage for that benefit? Were they addressed in 2006? To what extent has climate change affected those factors or exacerbated those stressors? What has changed in the best available science, technology, or public preference pertaining to that benefit?

Current initiatives to present information to the public on heritage resources show positive responses:

- (A.) Displays at visitor centers,
- (B.) Signage and information brochures at visitor centers and trail heads,
- (C.) Visitor-friendly management of places with heritage resource value (e.g., Vesuvius), and
- (D.) Extended development of an internal Geographic Information System (GIS) with emphasis on layers projecting data on heritage resources.

Through these management has benefited from the goals established in the 2006 Plan.

Stressors stem from competition for limited financial and organizational resources needed to effectively grow the heritage resource protection program. Stressors also include proximate external and internal land-use changes, and increasingly rapid ecosystem changes.

Climate change generally has a negative impact on protection of heritage resources. Scientific data show that catastrophic events, such as wildfires, flooding, ice storms, and sustained periods of freezes and drought, occur with increasing frequency and intensity. Fire and flooding can cause catastrophic damage to buildings and structures (built environment resources), and the increase in severe flooding poses an immediate threat to archaeological sites. With the increasing frequency of catastrophic events it becomes increasingly difficult to budget effectively to protect prioritized heritage resources.

Since 2006 there have been advances in archaeological method, theory, and field techniques that expand the information archaeologists recover in the field and from ongoing studies of archaeological data. Geophysical testing is increasingly being incorporated into basic Phase I Archaeological Surveys and often yields surprising discoveries of sites and new information about previously recorded sites. Scientific studies of artifacts and archaeological data provide new and important information about known sites. Analysis of materials and treatments has led to new and improved approaches to preserve and protect buildings and structures.

(4) Ecological Conditions: How have the drivers of change altered the condition or capacity of the landscape to provide that benefit?

Increased demand for expansion of facilities for recreation, camping, hiking, bicycling, ATV riding, horseback riding, fishing, canoeing, boating, lumber, and jobs result in pressures restraining the growth of capacity for protecting heritage resources. We don't believe that there is less capacity for protecting heritage resources now than in 2006, but we are concerned that the capacity for protecting heritage resources does not appear to be keeping pace with the increased need.

(5) Sustainability: Are we already doing something differently we weren't doing in 2006? Can we exert any control of or mitigation for the intended benefit? Is WNF management sufficient in providing that benefit or is there a Need for Change?

The WNF has expanded its heritage resource database and increased the use of its GIS to analyze information as an integral part of a due diligence review before initiating work on projects.

We believe that the WNF has taken positive steps. The critical need at this time is to sustain, expand, and build on these initiatives. Here we suggest topics to support Framework discussions:

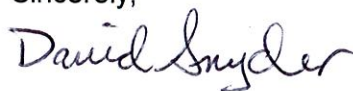
- (A.) Consider elevating heritage resources management to have equal footing within administration;
- (B.) Brainstorm ways to implement a plan to set aside and protect a statistically meaningful percentage of each type of identified pre-contact archaeological site within the WNF;
- (C.) Explore benefits of a comprehensive reevaluation of heritage resources to identify places warranting protection given anticipated future changes in the extent of development in the WNF;
- (D.) Discuss inclusion of geophysical testing as a routine field work technique in archaeological surveys and as an integral part of planning;
- (E.) Expand the GIS for heritage resources database and produce new ways to use the expanded GIS to motivate and encourage protection of heritage resources; and
- (F.) Establish a five-year plan to develop environmental impact analysis models that better and more fully integrate heritage resource data with natural resources data.

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For more than 15,000 years people living in southeast Ohio have interacted with, exploited, and managed natural resources, and these interactions repeatedly changed the environment in this region in profound ways. Interdisciplinary studies of integrated heritage resources and natural resources databases offer exciting opportunities for the WNF to develop innovative approaches to deal with modern forest management challenges.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm, or by email at dsnyder@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "David Snyder".

David Snyder, Ph.D., RPA, Archaeology Reviews Manager
Resource Protection and Review

DMS/ds (SHPO Serial Number 1076909)