

Data Submitted (UTC 11): 3/22/2020 2:32:19 PM

First name: alan

Last name: tonetti

Organization: ohio archaeological council

Title: trustee and government affairs committee chair

Comments: Thank you for providing an opportunity to comment on the Wayne's plan revision.

Regarding changed conditions pertaining to archaeological resources in the region, two basic questions need addressed: 1) using existing best available scientific information, what are the current and projected environmental, economic, and social conditions and trends affecting archaeological resources under the Wayne's management?, and 2) what is the best available scientific evidence and where do you get it? Although it is assumed the Wayne's archaeologist and other staff have access to much of this information, it is strongly encouraged that the Wayne work closely with the State Historic Preservation Office (SHPO) and academia in developing baseline data affecting archaeological resources on the Wayne. The Wayne should be able to provide a baseline from which to measure these conditions and how they affect archaeological resources now and into the foreseeable future. The apparent recognition of this need is encouraging as indicated by the statement in the draft assessment's data gaps section that "there is interest from the State Historic Preservation Office to collaborate on studying and monitoring the effects of land management on cultural and heritage resources" (Draft Assessment, p. 82).

That said, the draft assessment is primarily focused on natural not cultural/archaeological resources. This is illustrated by the statement "landscape-level coordination of information is necessary to ensure the sustainability of the region's natural resources well into the future" (Socioeconomic Conditions Supplemental Report Overview, p. 1). While that statement is true, it (perhaps unintentionally) devalues the numerous cultural resources in the Wayne. Because of the region's 200-plus years of extensive and intensive exploitation for its natural resources, from a cultural resource perspective the Wayne is primarily a cultural landscape that has been/is being "reclaimed" by nature. The Cultural & Heritage Resources section of the draft assessment somewhat acknowledges this, but the legacy of that exploitation deserves increased recognition and discussion with respect to the nature and significance of archaeological resources found on the Wayne.

Because of the Wayne's focus on its natural resources and its institutional constraints, it is understandable that archaeological resources have been managed primarily through the lens of the Section 106 process. However, doing so is not a best practice. It focuses too narrowly on specific projects and not the larger picture; on the "trees instead of the forest". As acknowledged, "there is a backlog of unevaluated sites, proactive inventories and evaluations conducted under Section 110" (Draft Assessment, p. 80). Institutional constraints are unlikely to change in the foreseeable future, so the Wayne's desire for new partnerships is strongly encouraged. Furthermore, it is encouraging to see that the agency established "a new performance metric 'Heritage Program Managed to Standard,' with a new geospatial dataset to encourage proactive work to be as important as project-level surveys driven by NHPA Section 106 compliance" (Draft Assessment, p. 82).

There seems to be some disconnect with the draft assessment and the socioeconomic supplemental report with respect to heritage resources. While the assessment does a pretty good job of very briefly summarizing the Wayne's heritage, the socioeconomic supplemental report's statement that "the region experienced a flowering and decline of successive American Indian cultures" ([Overview, p. 1) is uninformed and could be viewed as ethnocentric. A factual, nonjudgmental statement that the region was occupied by American Indians prior to Euro-Americans entering the region would suffice. Please consult with your American Indian advisor about this.

The Preservation of Heritage & Identity section of the socioeconomic supplemental report gives little recognition of the 13,000-year pre-contact American Indian history of the region, and the fact that much of the region's heritage is archaeological in nature. Archaeological resources not only fill a niche for preserving the region's history, they are indispensable to better understanding it. In this regard, archaeological resources in the

Wayne are underappreciated and underutilized, which the draft assessment appears to acknowledge. However, archaeological resources offer more than recreational opportunities or tourism attractions. They contain a 13,000-year record of the region's history that should be conserved and actively researched in a sustainable manner for the region, state, and nation.

Increased recognition and discussion of this heritage would help address local residents apparent "lack of awareness of Forest Service goals and objectives" regarding heritage resources on the Wayne, and their "ambivalence toward the role of the Wayne in safeguarding cultural resources" (Supplemental Report, Preservation of Heritage & Identity, p. 35). If there is a strong public perception that the Wayne is indifferent to the region's heritage and the preservation of cultural resources, that sentiment could lead to increased looting of cultural resources on the Wayne. These deficiencies should be clarified and addressed in the plan development phase.