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Comments: I wanted to offer comment on the Wayne's Forest Plan revision, in particular the Wildlands Fire & Fuels Supplemental Report. I was under the impression that the comment period had been extended until March 28, but I just discovered that it ended 4 days ago on March 23. I hope that the COVID-19 lockdown can provide an excuse for my delay, and that my comments might still be considered.

My main concern with the supplemental report is that it makes the argument that extensive fire is clearly indicated in the presettlement record (prior to 1800) in this region, but this is not the case. The main support for this argument is that the presence of oak indicates past fire. This ignores counter-arguments to this observation, including:

[middot] McEwan, R.W., J.M. Dyer, and N. Pederson. 2011. Multiple interacting ecosystem drivers: toward an encompassing hypothesis of oak forest dynamics across eastern North America. Ecography 34: 244-256.

[middot] Matlack, G.R. 2013. Reassessment of the use of fire as a management tool in deciduous forests of eastern North America. Conservation Biology, 27: 916-926.

[middot] Pederson, N., A.W. D'Amato, J.M. Dyer, D.R. Foster, D. Goldblum, J.L. Hart, A.E. Hessl, L.R. Iverson, S.T. Jackson, D. Mario-Benito, B.C. McCarthy, R.W. McEwan, D.L. Mladenoff, A.J. Parker, B. Shuman, and J.W. Williams. 2015. Climate remains an important driver of post-European vegetation change in the eastern United States. Global Change Biology, 21(6): 2105-2110.

[middot] Dyer, J.M., and T.F. Hutchinson. 2018. Topography and soils-based mapping reveals fine-scale compositional shifts over two centuries within a central Appalachian landscape. Forest Ecology and Management, 433: 33-42. https://doi.org/10.1016/j.foreco.2018.10.052.

These articles suggest that there is little direct evidence of fire in the presettlement forest, and that other factors can also be postulated as drivers of the observed change. The treatment in the Draft Assessment (1) ignores these references, or (2) uses their data to draw conclusions contrary to the source, or (3) misinterprets the evidence to bolster the fire explanation. As an example of #2, the Assessment Report ("Witness Tree Data," p. 6) cites the recent publication by me and Todd Hutchinson, in which we concluded "[M]esophication acts through diverse individualistic responses to a multiple set of interacting drivers. Specifically, regionally documented changes in land use, drought, N deposition, and fire at the time of the original surveys lead to altered competitive relationships." Unbeknownst to me, the authors of the Assessment Report used our witness tree data, classified each tree into "pyrophilic and pyrophobic" categories, and concluded that fire is the primary driver behind oak dominance in southeastern Ohio. The author goes on to quote another paper I contributed to (Iverson et al., 2019a), stating that "fire seemingly was a landscape-level phenomenon, burning regularly across most of southeastern Ohio[hellip]Only the pervasiveness of presettlement fire can adequately explain oak dominance throughout[hellip]" Yet this passage does not exist in this publication. He's instead quoting the Nowacki et al. (2019) Draft Terrestrial Ecosystems Supplement Report.

In essence, the author of the supplemental fire & fuels report is citing evidence from both my and Matlack's published works, in which we conclude "fire alone is not explaining what we're seeing," but then framing it exclusively in support of burning. I understand that Dr. Nowacki believes it is necessary to "return historic fire regimes" to the mesic deciduous forest of southeastern Ohio, and that this is probably the dominant view in the Forest Service; but it is not a monolithic view in eastern forest ecology. To selectively present evidence in support of one position without acknowledging alternative viewpoints in the literature runs counter to good

science. If the USFS wants to burn forest to favor certain species over others, then it would be better to state this without using historic conditions as justification.

Thank you for considering my comments,

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