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Comments: To Whom It May Concern,

The National Speleological Society (NSS), an 8,000-member organization with a longstanding partnership with the National Park Service, supports the release of national-level guidance on bolting and fixed anchors in Wilderness Areas. Our relationship, formalized through a Memorandum of Understanding, has led to significant achievements in conservation, science, and exploration. NSS initiatives and NSS members have been central to the exploration and documentation of Mammoth Cave, Carlsbad Caverns, Jewel Cave, Wind Cave and others. We feel that lack of guidance has long been a problem with consistent management principles, and has negatively hurt the utilization of the nation's resources for science, exploration, and recreation.

However, the NSS has significant concerns that the language of this guidance will make it difficult to fulfill both the mutually agreed upon goals in our MOU (see: [https://caves.org/committee/government-liaison/NSS\\_NPS\\_MOU.pdf](https://caves.org/committee/government-liaison/NSS_NPS_MOU.pdf)) as well as limit legitimate recreational opportunities defined under both the Wilderness Act and the Federal Cave Resource Protection Act of 1988 (FCRPA). Specifically, we have concerns over classifying bolts as 'installations' under the Wilderness Act.

We feel that fixed anchors are a requirement for the enjoyment of many caves, in addition to providing access for exploration and science. And feel that the proposal as written affects the following:

**Resource inventory:** The NPS is not equipped to conduct baseline inventories of their resources without the support of NSS. These inventories often require vertical equipment, including fixed anchors. The NSS provides significant support to the National Park Service's efforts to inventory and manage cave resources as required by the Cave Resource Protection Act of 1988.

**Mission Objectives:** The exploration, education, restoration, research, recreation, and other goals defined in the MOU between the NPS and the NSS will be significantly hampered by the rules as proposed.

**Resource Monitoring:** The support NSS cavers provide in resource monitoring under our MOU is fundamental for sustained resource understanding, with many miles of new caves explored each year, and a better understanding of the resource with the NPS cannot achieve on its own.

**Science:** Scientific and explorational cave access by NSS members provides the NPS with advanced research. Often the cave parks have some of the most active number of research permits of all NPS units because of the unique environment. This research advances climate change studies, microbiology, geology, and more.

**Recreation:** While we believe that the science and resource management are important, we also believe that caves have an intrinsic value in recreation. Caves have long played an important part in our culture with literature, films, and books continuously written about them. And we feel that limiting the rules as proposed will make recreation difficult if not impossible.

We believe that with the changes suggested below these goals can be met, which will enable the NPS to fulfill its mission while keeping the spirit of the Wilderness Act and preserving delicate resources.

We propose that all permits relating to cave bolting must incorporate a representative of the NSS Government Liaison Committee during the review process to assess the permit as it relates to caves. This will enhance safety and provide NPS staff with context to understand the permits before making a determination.

The NSS is concerned that the MRA process could become excessively burdensome, effectively acting as a ban. Often permit applications linger under review or get lost, lacking accountability. The guidance's timeline only has meaning if the NPS must follow through on it. Because of the long and complex history of the NPS and NSS

relationship, we'd like to see some accountability measures. We feel that if permits are never responded to within the timeline they could be automatically approved. We understand this is a radical change in policy, but having permits never even reviewed or having denials with appropriate justifications is not an appropriate management strategy. Alternatively unanswered permits could simply be reassigned automatically to another person and notifications provided to applicants. We believe that ignoring permits should have significant weight on performance appraisals. We cannot emphasize enough the frustration this behavior has caused the caving community over the years, and it needs to be remedied before proposing additional regulations that must undergo a similar permitting process.

Finally, while the NSS understands that fixed anchors can be a nuisance and distract from the wilderness characteristics the NPS wishes to preserve and promote, the proposal's language is somewhat ambiguous regarding the use of natural anchors or removable anchors. We fear that land managers without knowledge or experience in climbing or caving will ban all anchors due to the confusing wording, and we request clarification that natural anchors or removable anchors are NOT part of this policy.

The NSS is requesting:

- 1.The opportunity to discuss these concerns with decision-makers/authors for clarification
- 2.That temporary anchors such as removable bolts be explicitly excluded from the language describing bolts as "installations." Again, because nothing is left in place when these are used, we believe that it is inaccurate to refer to them as "installations." However, we are concerned that land managers will do so unless it is explicitly stated otherwise in the guidance
- 3.That once the guidelines are in place, NPS land managers consult with the NSS when making decisions on these matters as consistent with our MOU.
- 4.Clarification on what processes is being put in place that would prevent the NPS from taking no action at all.

Thank you very much for your time and attention, we look forward to your response and having a productive conversation to preserve the wilderness characteristics we both value while ensuring effective management of cave resources.

Kristine Ebrey