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Comments: Forest Supervisor Jewkes,

The Oregon High Desert Grotto of the National Speleological Society (NSS) is the local chapter of the NSS. We have formal partnerships with the USDA Forest Service nationally, and have decades of partnership in research and cave conservation with the Deschutes National Forest. We've been removing graffiti from caves on the district, cleaning up trash, partnering on prosecution and enforcement, as well as bat and invertebrate research. We generally support a new consolidated plan to manage caves. Unfortunately there are a few serious issues with the plan which need correction.

200 Foot Buffer - an absolute disaster

One of the portions of the plan which is a grave mistake is the new 200 foot buffer rule on engines, stoves, camping, mountain bikes, and more. This blanket 200 foot buffer will criminalize many officially sanctioned activities and trails. Official roads, parking lots and trails all over the forest are within this buffer zone. Prime examples are Lava River Cave Parking Lot, Boyd Cave Parking Lot, South Ice Cave Parking Lot, China Hat Road, almost every road on Mount Sheridan, many roads on or around Paulina Peak, hundreds of other roads, OHV trails, and mountain bike trails. If this rule goes into effect expect lawsuits from OHV and nonmotorized vehicle clubs in protest of the access restrictions, and from conservation groups on the other side saying the US Forest Service is in knowing and deliberate violation of its own rules. It will take years and millions of dollars to fix the thousands of existing violations of this rule. This will become a defacto closure of huge swaths of the forest to recreation, timber sales, and driving on hundreds of roads. In short, it is an impossible idea not supported by science or pragmatism. You need to strike the buffer in entirety and replace it with targeted relocations of roads, trails, and parking areas in specific sensitive spots as funding and time allows.

Releasing dust

While we absolutely support restricting release of foreign substances in the cave like smoke and glitter, simply walking or crawling through almost any cave releases dust in the air. Dust is a naturally occurring substance and should not be restricted. Please remove the "releasing dust" provision.

Temporary Anchor Restriction

Temporary anchors commonly include cams, stoppers, and webbing in a modern sense. They are useful in exploration of caves. They are low or no impact devices allowed in the forest in general as well as our National Parks. The ban of such devices is unneeded and at odds with general USFS practices. The ban should include bolts and pitons, not temporary anchors.

Wind, Bat, and Skeleton Caves Year Round Closure, Arnold Seasonal

The Forest changed this closure to year round from seasonal 10 years ago to see if the bats from vague old reports would return. The data over the last decade has not supported that summer use is substantial or that maternity use is present. We confirmed that the Forest does not have data to support maintaining these closures through FOIA request 2020-FS-R6-02685-F which revealed no summer counts have been done at any site. This closure is not needed or backed by data. The Skeleton, Bat and Wind Cave Closures have been hugely unpopular with locals, and has driven deep resentment of the USFS. Skeleton, Bat, Arnold and Wind Caves were recreational sites for generations. The Grotto has a strong opinion that Skeleton, Bat, Arnold and Wind Caves

should be left open during the Summer season for all to enjoy as it was throughout the 90's and most of the 2000's. Take the removable bars to storage in May and put them back on the gate in October as was done from 1990 to about 2009. The Grotto will continue to clean the caves and remove graffiti as needed. If you want Arnold closed seasonally, you should gate the crawl and do the same seasonal gate opening and closing.

Cody Borehole Year Round Closure

Cody Borehole had a few spear points found by Brent McGregor and Neil Marchington. We reported the finding to Penni Borghi and helped her collect the spear points years ago. The cave floors are mostly lava rock, and all the points have been removed. While some charcoal remains in the cave, there is no evidence that significant archaeological artifacts remain, nor are they highly likely to exist in the cave. The 4000 year old points were all located in clear view on the surface of the lava rocks. Cody Borehole is the deepest cave in Oregon, and a significant recreational destination. Hundreds of cavers have visited the cave for decades. The Grotto does not believe that this closure is needed or properly supported by the resources still present in the cave.

Edison Ice #1 Seasonal Closure

We know Edison Ice #1 is NOT a bat hibernation site, and that this cave was added in error. Our FOIA request revealed that Edison Ice #1 was not even the cave the Forest was talking about (#2 is what was meant). None of the Edison Ice Caves have any documented hibernation use in your records or ours. Mark Perkins 1984 report on "50 bats" was a 2nd hand undated report from a Cleveland High School teacher named Dick Pugh. Perkins said this report needed further study and his degree of confidence was "if this proves to be accurate". Brent McGregor and I have made multiple winter and year round trips to Edison #1 and #3 with no bats seen ever. While we agree that Edison #2 needs further study (since 1984), this study has not happened.

Charcoal #1 and Deg

We know Deg Cave is a hibernation site, and should be closed in the winter. Charcoal #1 and Deg don't have data to support a summer closure for bats. Your current closures are being widely ignored and unenforced as the caves are not gated and well known. Why add another unenforced and poorly supported closure?

Conclusion

We wish to thank your office for reviewing the outdated closure orders and working on a comprehensive plan to manage caves. We support the majority of the plan provisions not mentioned above. We wish to specifically thank Lauri Turner, Brock McCormick, and Bart Wills for their efforts and passion for caves. Our sincere hope is that our input helps make the final plan a better and stronger version. Thank you for reviewing our statement and updating the plan to include our input.