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Organization: Western Cave Conservancy

Title: Director

Comments: Enclosed is a letter of comments regarding the new Forest Order on Cave Protection. Thank you for the opportunity to provide input on this serious matter. As a long time caver and director of the Western Cave Conservancy I have a strong interest in seeing guidelines strengthened better enforcement of existing rules. While the majority of your plan is well done, there are a few problem areas that I have addressed.

Dear Ms. Jewkes,

I am on the board of directors of the Western Cave Conservancy (WCC), serving as Secretary and Director of Stewardship. The WCC has been active since 2003, primarily in central California, but we have also assisted cavers in Oregon with several conservation projects. Neil Marchington, of the Oregon High Desert Grotto, is also a director on our board and has spearheaded their ambitious and successful graffiti removal efforts and other conservation activities. He also has extensive knowledge and experience with regard to cave biology and works closely with the scientific community on this topic. He is well respected as someone who is extremely knowledgeable about Oregon caves, caving practices, safety, conservation and working successfully with volunteers and land owners. He has asked me to contribute my comments on the new Forest Order and I am happy to do so. I also want to add that I have the highest confidence in his recommendations to you.

While I have no personal experience with the caves mentioned in your document of Feb. 27th, 2020, I have every confidence that Mr. Marchington and his fellow cavers from the Oregon High Desert Grotto are very familiar with them and I defer to their specific comments on those situations. I can however, comment on some of the more general rules changes as noted below.

200 Foot Buffer Rule

It appears that this rule will cause serious problems with access by the public. The problem with lava tube caves is that in areas where they are abundant, it is impossible to have any road access or parking spots that don't come within 200 feet of a cave entrance of some type. Many caves have multiple entrances and when the roads were first put in, I'm sure the only concern was keeping the road on firm ground. If you were putting roads in today, you could, with careful survey work, devise a plan that would keep all roads and parking areas at least 200 feet away, but I'm sure that wouldn't be feasible at this point. It seems, at this stage, it would be best to replace this proposed 200-foot buffer with some prioritized relocations of roads, trails and parking areas in particularly sensitive locations.

Releasing dust

The restrictions of the release of foreign substances in the cave like smoke, chalk, bodily waste, glitter or other garbage is firmly supported, I must comment that including the word "dust" is inappropriate. Caves, unless they are wet and muddy, or recently scoured out by flooding, tend to be naturally dusty in places. Any movement, even simple walking or crawling will stir up dust. Dust is a naturally occurring substance and should not be restricted. Please remove the "releasing dust" provision.

Temporary Anchor Restriction

My final comment is on the restriction of temporary anchors. While I understand that this may be aimed at rock climbers it will have an unintended effect on the safety of cavers. In addition to being a caver myself for almost 40 years, I was a National Cave Rescue instructor for about 10 years 2004 to 2014. We taught our students to

employ a variety of temporary anchors such as cams, stoppers, knot or webbing stoppers and stemples (4"x4" lengths wood for example). They are not only useful in exploration of caves, but they can be essential in a rescue situation. Cave passages which are not consider "vertical" to an able-bodied person, quickly become vertical challenges for a person with even a sprained ankle, let alone a patient in a litter. These temporary anchors not only are low impact on the cave, but they can be reused over and over as the rescue team assists a patient out of the cave. A ban on permanent anchors, such as bolts, seems like a good idea, given the nature of the problems you have had in certain caves.