

Data Submitted (UTC 11): 7/22/2020 7:00:00 AM

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Forest Supervisor Jewkes,

I have quite a few concerns about the proposed new Cave Resource Forest Protection Order. There are several parts which seem unnecessary, and additional pre-existing decisions made about some specific caves and cave management in general that I would like to see revised. I am fully in favor of scrapping this order and writing a new one in consultation with the Oregon High Desert Grotto, the local to Deschutes branch of the National Speleological Society.

While I do not live in the direct vicinity of the Deschutes National Forest (I live about 4 hours away in Wilsonville, OR), I have been going caving there since I was a little girl - since the late 1980's or early 1990's. I started caving with my dad, an ex-NFS employee, and also visited many of the caves along China Hat Road in Bend with my school later, in 1992 or 93. Since then, I have been back many times, and am an active member of several grottos - the Oregon High Desert Grotto, the Willamette Valley Grotto, the Oregon Grotto, and the Cascade Grotto (based out of Seattle). I travel around the PNW visiting caves for fun, but also trying to help share the love of geology and history with various groups including the boy scouts. I do vertical caving as well as regular caving. As a NSS member in good standing, I believe firmly in sharing caving ethics with others, leave-no-trace, and am often doing unofficial or official cave clean up when I see it is needed (largely by picking up trash that others have left behind at more known caves).

My most recent visit to the Deschutes National Forest was around Memorial Day Weekend. We visited several of the publicly known caves, as well as some lesser known ones. Among those were a few of the several currently under Forest Service management: Arnold Ice Cave, Hidden Forest Cave, and Boyd Cave. The first of my

concerns regarding the proposed Cave Resource Forest Protection Order is the issue of enforcement. When we were there we removed a large amount of trash from Arnold Ice Cave. We camped in the vicinity off of China Hat Road, and there were several large trucks playing music and with people camping at the turnout to Arnold Ice Cave, which made us hesitant to visit it the first evening we were there, though we went back the next day. That next day we removed a large bag of trash, including a half empty beer bottle from the very back of the cave. We also went to Boyd Cave, and we removed trash there as well, including two pairs of soiled underwear and a pile of what looked like dog poop. We also did some vertical practice near Arnold Ice Cave, not being aware that temporary anchors (in this case webbing and quick links - anchors following approved leave-no-trace practice) were not allowed at caves in the Deschutes National Forest. We saw no evidence of current laws or policies being well posted or enforced at the caves we visited that are currently under direct NFS management that are open and known to the general public. Additionally, we observed that visitors were not following current COVID-19 suggestions of staying 6 feet apart or wearing masks. This leaves me in great doubt of the Forest Service's ability to enact and enforce new regulations on it's own. Partnering with local organizations like the OHDG seems by far to be the best option for creating a successful plan for cave regulation, maintenance, and awareness.

My other big area of contention is in the timing of this order. I was not able to write in during the first comment period because of the timing - the comment period was from the beginning of March, through April, right when the Corona Virus pandemic was closing everything down. While I had every intention of writing in then, the pressure of having to shut down work, figure out how to pay bills, and caring for my family, were priorities. I wanted to point this out as one huge reason why you probably only had 22 people write in during this comment period. Many of us had the concerns of how to stay afloat in this strange new world taking priority over forest service orders. This makes the timing of this order seem both unwise and unfair to the people who care about the area and the caves there. It seems down right unethical to ask for public comment during a local and national state of emergency. It is easy when you are not interested in visiting a cave to say, "yes, ok, they should close them just in case," but when you are a caver who loves geology and history and the outdoors and you are told you might never be able to go and visit, in a careful, ethical, leave-no-trace fashion, those places you have dreamed of visiting, or that you may have even discovered, it becomes a much more urgent and personal issue. Should this order be enacted I would fully expect to hear that cavers stop reporting cave finds of significant interest to the NFS in order to maintain access and secrecy. Over the last year, cavers have submitted many caves as areas of significance to the NFS, and if we fear our access being taken away with no clear idea of how it will be managed or permitted, that fear will inhibit good communications between cavers, the grottos, and the NFS. That would be bad news for everyone involved.

I'm going to go through and address some of the areas of the proposed protection order point by point. But to be clear, I do not support this order. I think that it is well-meaning, but has many flaws. I believe it should not be enacted, but rather set aside and another order and management plan drawn up with consultation of the NSS and OHDG.

I support the changes to this order suggested by the Oregon High Desert Grotto:

*Approving the proposed OHDG Challenge Cost Share Agreement and Management Plan, or a similar plan that shares stewardship and responsibility for maintaining and protecting Eternity and Infinity caves with the Oregon High Desert Grotto.

*Leaving Cody Borehole open year round. This is a destination known mainly to cavers, not the general public, and as the deepest cave in Oregon is an important recreational site to cavers. With further exploration it has the potential to someday lead to the discovery of the longest lava tube in the State of Oregon. 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.

*Change wording around regulating and/or not allowing "digs" in caves. While it is understandable that any significant archaeological site should be protected with no digging allowed, this term is generally used in the caving community to describe the removal of rocks to find caves or explore new passages in caves. If we are to find new caves, or new passages in known caves, responsible "digging" by ethical cavers must be allowed. If this is a misunderstanding in terminology, it needs to be adjusted and made more specific. As written this rule is unacceptable. Cave digs are well established techniques used around the nation and occur at the entrances to enable finding caves in the first place, or deep inside the terminal ends of passages. One example of the incredible value of cave "digs" is Lechuguilla Cave in Carlsbad Cavern National Park. While the oversight of digs is a reasonable goal, this is something that would best be organized in cooperation with the OHDG.

*Some of the caves suggested for year round closure by the proposed order should instead be closed seasonally rather than year round, and additionally some caves that are currently closed year round for bat hibernation should be restored to public seasonal access. Bat hibernation should only cause seasonal closures. This can be done by seasonal gate removal or by allowing the reservation and picking up of a key at a local forest service office. These caves include: Wind Cave, Bat Cave, Skeleton Cave, Charcoal Cave #1, and Deg Cave.

*The 50 foot buffer zone suggested around caves should be removed from the proposed order and the areas around caves should be managed on a site-to-site basis. Many of the 700 caves in the Deschutes National Forest have entrances that are small openings and are secret, so almost all campers would have no knowledge if they were within a 50 foot buffer zone. If an area's access needs to be restricted, doing so by methods like gating roads or blocking off parking areas in close proximity to them so they make unattractive pull-outs or camping sites would make more sense. This rule is also largely unenforceable.

*Change current wording of forest orders to allow use of temporary leave-no-trace anchors such as webbing, cams, and nuts/stoppers in caves. These are accepted around the United States, and disallowing use of them in caves is unreasonable. They will not damage caves, they are needed in order to fully explore some caves, and without them we risk not making discoveries of scientific or historical interest.

As a caver and local grotto member I am in favor of more oversight of the caves in the Deschutes National Forest, but I would like to see it done in a way that is sustainable, with the cooperation and assistance of the National Speleological Society and Oregon High Desert Grotto. This proposal is not that, and a new one needs to be written with more input from the local caving community.

Regards,

Vandy Hall