

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

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Forest Supervisor Jewkes,

I am not in favor of approving the proposed new Cave Resource Forest Protection Order as it is currently written. I am in favor of drafting a new proposal with input from the National Speleological Society, and their local-to-you branch, the Oregon High Desert Grotto.

Firstly, I would like to point out that the comment period for the initial version of this proposal happened just as the state wide shutdown for the COVID-19 pandemic was getting started. The NFS received very few letters at the time, likely because most people were worried about the pandemic and had other higher priorities. This proposal should have been delayed to when we were not in a state of emergency. Expecting to have any response to and input by the public during a national emergency is both unreasonable, and unethical.

My objections to the current version of the proposed Cave Resource Forest Protection Order are that it is both impractical and unenforceable. Rather than limit activities that endanger the caves within the Deschutes National Forest, it will mostly limit the access of responsible cavers and NSS members. The majority of the around 700 caves in the Deschutes National Forest are known only to cavers, and the majority of caves currently suffering from vandalism and over use are caves that are already covered in previous acts, are of the small number known to the general public (non-cavers), supposedly under the management of the Forest Service, and the Forest Service is already failing at protecting these caves and enforcing policies regarding them. I believe that more attention should be paid to these caves and their state, as well as educating the public about caves, rather than keeping cavers and grotto members who follow leave-no-trace ethics from further cave exploration and discovery. Without cave exploration we wouldn't have most of these 700ish caves, and if the proposed order goes through as worded it would lead to ill will between cavers and the NFS and would likely lead to caves not being reported to the NFS or submitted as significant sites.

Additionally 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 Lechugilla 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.

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 NSS 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,

-Christopher Epperson