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Organization: San Joaquin Valley Grotto

Title: Secretary

Comments: Forest Supervisor Holly Jewkes

Deschutes National Forest

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John Bowling

Forest Supervisor Jewkes,

I have concerns about the proposed cave order. I would urge the USFS to cooperate with the Oregon High Desert Grotto (OHDG), members of a fellow grotto of the National Speleological Society, as much as possible to continue responsible management and exploration of the caves within the Deschutes NF. In particular, I'd like to echo the following concerns:

Eternity and Infinity Caves - Closed, gated, and properly managed

The Oregon High Desert Grotto found these caves and have since managed these caves in the most restrictive manner. I urge you to approve the OHDG's proposed challenge cost share agreement and management plan on these caves.

Cave "Digs" AKA Passage Modification

Cave digs are well established techniques in cave exploration around the nation. While cavers can agree that oversight of digs is likely reasonable and legally required, the Forest should reply to the OHDG's requests about what such oversight will be, and what processes and criteria you will base your decisions on.

Temporary Anchor Restriction

Temporary anchors, including cams, stoppers, and webbing, 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 more permanent and damaging anchors such as bolts and pitons, not temporary anchors. There is NO governmental interest in banning TEMPORARY anchors.

50-Foot Buffer Rule

I defer to the Oregon High Desert Grotto's opinion on this. It's far too vague for codification in your management plan. It appears intended to protect bats from disturbance, yet most of the caves on your forest do not have significant bat use. While it was proposed with good intentions, 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.

Regarding other specific cave closures, seasonal or otherwise, I'd urge the FS to consider the opinions of the OHDG. The OHDG, as all active NSS grottos nationwide, are among the USFS' best resources for cave management input and, if not direct legal enforcement, monitoring of the state of the cave resources.

Kind Regards,

John Bowling

Secretary, San Joaquin Valley Grotto (of the National Speleological Society)