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Organization: Western Region National Speleological Society

Title: Secretary-Treasurer

Comments: Comments on the proposed Cave Resource Protection Forest Order

As a long-time caver and as the current Secretary-Treasurer of the Western Region of the National Speleological Society, I have concerns about the Cave Resource Protection Forest Order. I support the on-going relationship between our members that volunteer with conservation and cave management and the Forest Service across the country. The MOU at the national level is an important component in interactions between volunteers and the United States Forest Service.

Protection needs to be thoughtfully considered, with measures that protect and also allow the public the fullest access possible.

Members of the Oregon High Desert Grotto (OHDG) of the NSS have long worked with the United States Forest Service on conservation, restoration, and protection of cave resources. Their concerns regarding this Order are valid.

Specific points of concern:

1. Members of the OHDG located and have managed Eternity and Infinity Caves. Their proposed challenge cost share agreement and management plan is a reasonable way to protect these caves and also allow access to these resources. The caves need gating which is something the OHDG can do.
2. Keeping Cody Borehole closed all year is excessive. This cave is a significant recreational resource that is well known. Closure of this cave makes little sense, leading to resentment of protection that other resources need. If closures appear arbitrary, there is a reluctance to inform the USFS of new discoveries.
3. Lower Quartz Mountain and Lee's Caves are bat hibernaculums. Observation of bats being present as late as May would indicate a longer period of closure, from 1 Oct through 31 May will provide greater protection.
4. A blanket prohibition of all digging in caves is too strict. Providing clear directives of what is allowed helps everyone.
5. Currently Wind, Bat, and Skeleton Caves are closed after being open seasonally in the past. While closing these caves for a period to see if these caves are maternity caves was reasonable, the evidence is that bats do not use them for these purposes. Local residents know of and have enjoyed exploring these caves for many decades. The closures lead to resentment of the USFS and ill-will. Allowing seasonal use of these caves as well as Arnold Cave will be a great improvement and lead to local good will.
6. Prohibition of temporary anchors makes no sense. Anchors provide protection of both the resource and individuals. I agree that banning permanent anchors is wise, but banning temporary anchors isn't. The latter are allowed in national parks and forests elsewhere without problems. What is the purpose of banning temporary anchors in or around caves?
7. Deg Cave is a known hibernaculum and closure during the winter makes sense. Closing this cave as well as Charcoal #1 during the summer isn't supported by data. In reality, since these well-known caves are ungated the closures are generally ignored. Allowing summer usage, which already occurs, allows greater respect for other closures and less need for USFS resources.
8. Exactly how will a 50-foot buffer around caves work? While the intent seems to be to protect bats, what works for one cave may be unworkable elsewhere. Rather than a blanket ban on normal use of forest lands, a more nuanced buffer system based on specific caves is more functional. Rules that are impossible to follow, and that arbitrarily limit access are not effective. They do lead to resentment and less respect for valid concerns.
9. What is a "Certified Service Animal"? If a rule regarding the access of service animals but not pets in general is needed, then the rule needs to be written to match current ADA requirements.

Thank you for allowing the public input. A comprehensive cave-management plan that is current and meets current standards is important. I believe that while well-meaning, the current plan needs further work that includes input from the general public and knowledgeable cavers. More work is needed that clarifies the concerns above and that of others. Please modify the current version so that requirements are not overly broad and vague. Tailoring the rules based on the specific areas involved will be more functionable and enforceable.

Sincerely,

Gail McCoy