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Organization:

Title:

Comments: 1.0 As a Life Member of the National Speleological Society (NSS), I am concerned that you have not considered caves, nor the tremendous impacts on sensitive cave environments by recreational climbers.

1.1 Caves are exceedingly sensitive in ecosystems and habitat.

1.1.1 In my caving experience since starting in 1974, I have come to realize, as other cavers and cave scientists have, that cave walls often have bio-mats, often throughout entire systems, and also including entry areas.

1.2 Recreational climbing continues in caves, such as the west and northwest lava tube systems, with no regard to the ecosystem, by persons who are not cavers, who don't get it - don't have a clue (or maybe some do), on the:

1.2.1 impact recreational climbing has on cave ecosystems and habitat, and

1.2.2 impact on cave formations used for anchoring, and

1.2.3 impact on historic writing. It is exceedingly important that rock art was recognized for protection, but this must also include historic writing older than 50 years.

1.3.4 You can review my 1993 Cave Management Symposium paper on what constitutes historic writing as opposed to vandalistic graffiti.

1.3.5 Bat roosts and hibernacula tend to also be near cave entrances. Recreational climbing in these areas during hibernation and summer maternity colonies absolutely kills bats.

1.3.5.1 There is also the issue of non-cavers picking up White Nose Syndrome spores, not doing decontamination and taking the disease elsewhere.

2.0 Special Recreation Permits (SRPs)

2.1 SRPs could very well protect cave and non-cave resources subjected to recreational climbing.

2.2 However, because SRPs require participant insurance and fees, the concept of further opportunities is not necessarily true, because:

2.2.1 participants may not have that kind of money, and or

2.2.2 participants may resent the additional bureaucracy the SRPs impose.

3.0 You continue to make the same obviously uninformed mistake across the USFS.

3.1 There is no such thing as National Forest System (NFS) lands, and there's no such thing, and all the USFS signs continue the myth, by calling the land "Forest Lands."

3.2 It is PUBLIC LAND! It is National Forest System-managed Public Land; it is NFS-managed Public Land, and it is Forest-managed Public Land.

3.3 USFS does not own the land, and your continual failure on this aspect gives the wrong idea to the personnel of your agency, other agencies (BLM is particularly guilty of the same mistake), the public, and industry.

3.4 It is public land and that's how ALL your documents must return to being structured, as they once were by earlier managers.

3.5 The consequence of acting as though the USDA owned the land is that the public thinks the USDA has sold or given away their public land.

4.0 Conclusion

4.1 I recommend that recreational climbing be banned in caves and cave entrances on this side of gates for my stated reasons.

4.2 Use the terms National Forest System-managed Public Land; NFS-managed Public Land, and Forest-managed Public Land.

4.3 What I have stated is from my experience - in addition to being a Life Member, NSS, I am a retired 25-year career BLM outdoor recreation planner, and the entire time served as a cave specialist at each duty station - Taos Field Office, Roswell Field Office, Socorro Field Office/Albuquerque District Office, Winnemucca Field

Office.