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Comments: The Colorado Cave Survey (CCS) is an elected body of cavers who serve as a liaison to maintain an open and cooperative relationship between the Colorado caving community and federal, state, and private land management agencies who own and/or manage many of Colorado's caves. The Survey has worked to secure protection for caves and karst in areas threatened by timber harvests, mines, quarries, and road development, and has actively campaigned to maintain access to Colorado's caving resources.

CCS affiliates have been studying caves in Colorado, including Sweetwater Indian Cave, for over 60 years. Our work in these caves goes beyond the typically associated cartographic studies to focus on geologic, biologic, hydrologic, archaeological, and paleontological inventories where appropriate.

Roughly a decade ago, a cartographic survey and inventory in Sweetwater Indian Cave was conducted largely focused on updating & correcting the existing map. At this time a caver funded conservation kiosk and visitor register were installed as well as extensive trash removal from the cave and the immediate area.

Over the years, CCS cavers have worked to document the pictographs and signatures in this cave as well and any associated degradation. One of these studies at Sweetwater Indian Cave focused on "the cowboy writing". This study was able to determine the blue paint, long presumed to be modern graffiti, in fact dated to the late 18th century!

CCS volunteers have worked closely with WRNF on various projects, providing the results of our work to aid WRNF in understanding the caves and karst features across the forest. Our group has partnered with WRNF long before our first official cooperative agreement was signed in 1985.

In light of our shared history with WRNF, we have read this scoping letter with some concern. The final bullet point of the proposed actions addresses the development of a future cave management plan:

"For the cave within the project area, develop a cave management plan in consultation with the tribes to ensure the vital cultural history is preserved and incorporate the plan into the proposed special use permit."

The membership of the CCS formally objects to the noted exclusion from the development of a management plan for Sweetwater Indian Cave. Please understand that we are very willing to continue our collaborative efforts in regards to this process.

The current WRNF-CCS MOU FS Agreement #21-MU-11021500-049 contains the following stipulations regarding the development of cave management plans:

#### IV. THE U.S. FOREST SERVICE SHALL:

E. Consult with the Cooperator on efforts to map, document, and conserve cave or karst resources or educate the public about the same.

F. Work with the Cooperator when creating cave management plans to ensure that they provide reasonable and appropriate access for recreation, exploration, conservation, scientific, and training activities, while also conserving cave resources.

Additionally, our parent organization, the National Speleological Society (NSS) holds cooperative agreements with the United States Forest Service (USFS): the USFS-NSS Memoranda of Understanding (MOU) FS

Agreement # 21-MU-11132428-161 and the USFS-NSS Master Plan Agreement (MPA) FS Agreement # 24-PA-11132426-059. These documents all contain similar passages regarding the inclusion of cavers in the development of cave management plans.

We also object to and are concerned about the continued actions of WRNF publicizing cave locations which pointedly disregards federal regulations put in place to protect cave resources.

In this most recent instance; the location of the cave was clearly marked on the map provided in the scoping packet by WRNF and distributed to the public. Subsequently, the map, with the cave location emphasized, appeared in at least one news article with both online and printed newspaper editions.

Providing cave location information in public correspondence is a violation of the Federal Cave Resource Protection Act (FCRPA), Section 5; and the Code of Federal Regulations (CRF), Title 43, Subtitle A, Part 37, Subpart B, § 37.12. The publication of cultural site location information is a violation of both the National Historic Preservation Act (NHPA) and Archaeological Resources Protection Act (ARPA).

Of further concern, neither the article, nor the scoping packet contain information regarding the current closure order of this cave (Order #2022-09), or the long standing forest wide cave closure order due to concerns of White Nose Syndrome (Order # R2-2021-02). While that may seem to be outside the goals of this scoping packet, by providing the location of a cave to the general public, WRNF should recognize their responsibility to educate potential visitors about current regulations and the now very real threat of unintentional spread of a deadly fungal pathogen.

On behalf of the cavers we represent, the Colorado Cave Survey encourages WRNF to honor existing agreements between the two parties by including CCS in all discussions surrounding the development of a cave management plan. CCS cavers also call on WRNF to scrutinize future publications to avoid what is becoming a troubling precedent regarding the protection of precious cave and karst resources.

Best regards,

Jennifer Zedalis  
Colorado Cave Survey - Chair