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Comments: Regarding caves and caving in the Tongass National Forest:

I am writing as the president of the Glacier Grotto, the only caving club in Alaska, offering my personal opinions, which generally reflect the opinions of our members, although not every individual may fully agree. I am offering some comments on the current Tongass Forest plan as outlined in Appendix H, Karst and Cave Resources, which aim to "maintain natural karst processes and the productivity of the karst landscape while providing for other land uses, where appropriate." It also specifies that management should be done by "seeking participation from interested individuals and organizations, such as caving groups, scientists, recreationists, and development interests in managing the karst resources."

I respectfully suggest that the current limitations on recreational caving should be minimized. Rather than creating designated recreational areas, we should allow for low-impact exploration by those who are properly equipped and experienced. Caving in the sparsely populated Tongass is largely self-regulating; for example, the challenges posed by vertical passage naturally restrict their use to those who have the necessary skills and equipment to do so. Cave locations also are already protected thanks to strong federal laws, and generally spread by word-of-mouth, rather than broad public dissemination.

Additionally, the current plan requires that permanent anchors are only installed with prior Forest Service approval. This requirement seems overly burdensome since very few individuals have the ability and equipment to do so. Enforcing this rule is almost impossible. Bolts used for vertical caving are low impact and do not create a significant visual impairment to the natural appearance of the cave. If it is truly necessary to restrict bolt placement, guidelines should be in place that specifically address the proper protocols for use, based on expert guidance. Similarly, the permit requirement for digging appears redundant- cave defacement is already illegal, and the added regulation does little to enhance protection.

I have also been told by Forest Service personnel that all cave diving requires a permit. Given that cave diving is rarely done in these remote areas of the Tongass, and unlikely to significantly impact the cave environment, this requirement seems unnecessary to add to the plan. I would advocate that this restriction is not added into future revisions.

The Tongass National Forest is a remarkable and diverse landscape, and it would be unfortunate to impose overly restrictive rules that might deter responsible and experienced explorers. By adopting flexible, low-impact guidelines, we can protect these natural treasures while still allowing the well-prepared to enjoy them.

Thank you for considering my feedback.