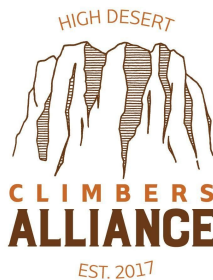




Protect America's Climbing



July 23, 2020

Deschutes National Forest  
Attn: Holly Jewkes - Forest Supervisor  
63095 Deschutes Market Road  
Bend, OR 97701

Submitted via email:  
comments-pacificnorthwest-deschutes@usda.gov

**RE: Comments on Deschutes National Forest Cave Resource Protection Forest Order  
DRAFT Environmental Assessment**

Dear Forest Supervisor,

Access Fund and High Desert Climbers Alliance (HDCA) appreciate this opportunity to provide comments on the DRAFT environmental assessment (EA) regarding the proposed Forest Order that would prohibit specific activities in and around caves where activities are thought to create adverse impacts to cave resources. We provide the following comments to assist in refining the order and providing a balanced approach to managing recreational rock climbing while protecting cave resources.

**Access Fund**

Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund holds a Memorandum of Understanding with the U.S. Forest Service.<sup>1</sup> For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

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<https://d1w9vyym276tvm.cloudfront.net/assets/AF-FS-MOU-2020.pdf?mtime=20200711232710&focal=none>

## High Desert Climbers Alliance

High Desert Climbers Alliance (HDCA) is the collective voice of climbers in Central Oregon. HDCA is the local Access Fund affiliate and also a 501c(3) organization. Through education, stewardship and collaboration with land managers, HDCA protects climbing access and works to keep our climbing areas beautiful. For more information visit [highdesert.rocks](http://highdesert.rocks).

### Comments

Access Fund and HDCA provide the following comments regarding the Cave Resource Protection Forest Order DRAFT EA in an effort to assist the Forest in creating a consistent management plan for the protection of caves. Our organizations support resource related closures that are based on well documented scientific evidence. Our primary concern with the current Cave Resource Protection Forest Order DRAFT EA (proposed Order) is that the proposed restrictions on over 700 caves across the Forest are not specific to each site's needs. We appreciate the need for a more consistent policy across the Forest, however we strongly advise that Deschutes National Forest considers a more tailored management strategy.

The proposed Order states that within 50 feet of a cave opening, the installation and or use of permanent or temporary anchors or bolts are prohibited.<sup>2</sup> We appreciate the reduction from 200 feet in the proposed scoping document<sup>3</sup> to 50 feet of a cave opening. However there was no explanation provided in either document to substantiate either proposed buffer. We continue to request further rational and scientific evidence regarding the proposed buffer/closure size.

### Bat Protection

Access Fund has partnered with Climbers for Bat Conservation, an organization affiliated with Colorado State University<sup>4</sup> to help biologists collaborate with climbers to learn more about bat behavior as well as recreational impacts related to bats and their habitat.<sup>5</sup> In addition, we have climbers across the United States volunteering as citizen scientists to help biologists learn more about bats and how they interact with climbers as well as habitat preferences and behavior. We have partnered with other National Forest districts including the White River National Forest in Colorado to address climber interactions around cave habitat. Access Fund and Climbers for Bat Conservation encourage climbers to report sightings of roosting bats to Climbers for Bat Conservation (<https://climbersforbats.colostate.edu/>). Observations such as the number of bats, where they were located, if any dead bats were seen, or if white residue was seen on the face of the bat(s) are valuable. We also inform climbers to not approach the bats to obtain this information.

Currently, there are no studies specific to the impacts rock climbing and the installation of fixed anchors have on the behavior or habitat use by bats in caves. Thus, the recommended buffer distances proposed in the DRAFT EA should be open to an adaptive management strategy. As

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<sup>2</sup> [https://www.fs.usda.gov/nfs/11558/www/nepa/112943\\_FSPLT3\\_5311610.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/112943_FSPLT3_5311610.pdf)

<sup>3</sup> [https://www.fs.usda.gov/nfs/11558/www/nepa/112943\\_FSPLT3\\_5240766.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/112943_FSPLT3_5240766.pdf)

<sup>4</sup> <https://www.climbersforbats.colostate.edu/>

<sup>5</sup> <https://www.accessfund.org/open-gate-blog/climber-can-help-save-bats>

more research and data becomes available related to rock climbing impacts on cave habitats, land managers should have the ability to adjust buffer sizes around caves.

What is better understood and accepted is restricting recreational access beyond the drip line of a cave, which has research based on caving impacts and potential to spread white-nose syndrome to bats. It seems reasonable for climbers to adhere to the same rules cavers must follow if they want to recreate inside of a cave past the dripline.<sup>6</sup>

The current proposed Order is heavily focused on rock climbing activities and does not specifically mention management strategies for other recreational user groups (i.e. cavers). We suggest regulations specific to climbing and the use of permanent or temporary anchors be based on a case by case assessment specific to each cave's unique resource protection needs. The proposed blanket 50 foot buffer should be used as a starting place and open to alteration under adaptive management strategies as more data is collected in the future related to potential rock climbing impacts and cave habitats. A 50-foot buffer may not be adequate in some cave ecosystems and in others too broad and overreaching.

The consideration of seasonal or time of day closures related to specific resource protection needs should also be considered rather than permanent closures. This is a very common and widely accepted management strategy in raptor conservation efforts.<sup>7</sup> Management strategies in other Forests include asking climbers to avoid climbing near entrances of caves during dawn and dusk to avoid disturbance as bats become active and enter and exit their roost. Currently, there is no direct evidence of climbing activity or the installation of fixed anchors outside of a cave having negative impacts of roosting bats inside of the cave feature. We request further research be conducted on this theory prior to regulations being put in place. The following questions should be applied when assessing a cave for closure or restriction to rock climbing:

- Are there bats present?
- What species of bats are present?
- Does the species have federal, state or any other type of special protection designations?
- What is the species distribution in the climbing area?
- What are the aggregations of bats in the area?
- What are the ecological requirements of the species of bat present?
- Has climbing specifically been proven to adversely affect the behavior of roosting bats?
- Do other recreational activities take place in the area that may affect the species?
- Are there other sensitive species or plant habitats present?

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<sup>6</sup> <https://www.whitenosesyndrome.org/>

<sup>7</sup> <https://www.accessfund.org/open-gate-blog/why-raptors-need-space>

## **Cultural Resource Protection**

Access Fund supports the protection and preservation of cultural resources. We appreciate the need to keep cultural resources private but we encourage communication about specific caves or areas around caves that require protection for general resource concerns. The following questions should be applied to caves on the Deschutes National Forest.

- Have archaeological and cultural resources been identified along with an adequate resource protection strategy?
- Is the specific cave historically or currently important, sacred, or protected for local and regional tribal entities?

## **Vegetation**

The conservation of cliff and cliff top vegetation and ecology is better studied and understood as it relates to rock climbing and the installation and use of fixed anchors.<sup>8,9</sup> In many cliff systems, the use of well placed fixed anchors can actually preserve vegetative ecology including trees on tops of cliffs that may otherwise be used as anchors. Again, each cave and cliff has its own unique ecological features and should be assessed on an individual basis as much as is feasible to develop the best set of rules that allow for the installation of anchors for rock climbing where appropriate while also protecting sensitive resources.

## **Site-specific and Adaptive Management**

The proposed Order should include language that allows for site specific management with adaptive management options. According to the US Forest Service, "Adaptive management is a system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate management changes that will best ensure those outcomes are met or re-evaluated."<sup>10</sup>

The proposed Order should state the exterior of caves shall remain open unless sensitive resources have been identified. If data or survey information is available to support adding a buffer closure then closures should be implemented. We recognize the Forests efforts to protect over 700 caves under one order, however this wide scale closure may not offer the highest levels of resource protection in some cases and in others is arbitrary.

If the Forest insists on carrying forward with a hard closure of all 700+ caves within a 50 foot buffer of the opening, we request a process be established for climbers and other recreational users be established to submit access proposals for specific cave features of interest. This would allow Forest biologists and cultural resource specialists to review the specific cave feature and protect sensitive resources while potentially allowing for sustainable recreation. The DRAFT EA states *'Persons interested in engaging in an otherwise prohibited activity (e.g., accessing a closed cave, installing or using any permanent or temporary anchors or bolts) can apply for a*

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<sup>8</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0006320716305456>

<sup>9</sup> <http://www.climbingmanagement.org/issues/vegetation>

<sup>10</sup> USDA Forest Service. 2008. National Environmental Policy Act Procedures, Final rule. 36 CFR Part 220, RIN 0596-AC49. Federal Register/Vol. 73, No. 143/ July 24, 2008.

[https://www.fs.fed.us/emc/nepa/nepa\\_procedures/includes/fr\\_nepa\\_procedures\\_2008\\_07\\_24.pdf](https://www.fs.fed.us/emc/nepa/nepa_procedures/includes/fr_nepa_procedures_2008_07_24.pdf)

*special use permit.*<sup>11</sup> We encourage the Forest to further define this process and include a set of criteria for climbers to consider if interested in applying for installing fixed anchors within the 50 foot buffer area around a cave feature. Examples of criteria could include a checklist to evaluate if cultural, rare geologic features, threatened or endangered plants and or wildlife are present. Clear definitions regarding each sensitive criteria item should be included, i.e. what is a rare geologic feature, ect.

### **Partnerships**

Access Fund and HDCA would like to partner with the Deschutes National Forest to further refine the DRAFT EA for the proposed Order. We can work with the local climbing community to assist in collecting an inventory of caves that may be of interest to climbers and assist in establishing guidelines that fit the resource, while allowing for responsible recreation and resource protection. Some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant<sup>12</sup> or assistance from the Access Fund Conservation Team,<sup>13</sup> which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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<sup>11</sup> [https://www.fs.usda.gov/nfs/11558/www/nepa/112943\\_FSPLT3\\_5311610.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/112943_FSPLT3_5311610.pdf) pg. 19

<sup>12</sup> [http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000903/k.9722/Grants_program.htm)

<sup>13</sup> [http://www.accessfund.org/site/c.tml5KhNWLrH/b.7653393/k.AFFB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tml5KhNWLrH/b.7653393/k.AFFB/Conservation_Team.htm)

Thank you for your consideration of these comments on the Deschutes National Forest Cave Resource Protection Forest Order DRAFT EA. Access Fund and HDCA have the experience, local contacts, and resources to help planners craft management strategies that encourage climbing where appropriate while sustaining the health and integrity of the landscape and the recreation experience. Access Fund and HDCA look forward to continuing to work with the Forest. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone (303) 552-2843) or email ([katie@accessfund.org](mailto:katie@accessfund.org)) to discuss this matter further.

Sincerely,

A handwritten signature in black ink that reads "Katie Goodwin". The signature is fluid and cursive, with the first name "Katie" being more prominent than the last name "Goodwin".

Katie Goodwin - Policy Analyst, Access Fund

A handwritten signature in black ink that reads "Jeremy Bowler". The signature is very fluid and cursive, with the first name "Jeremy" being the most prominent part of the signature.

Jeremy Bowler - President, High Desert Climbers Alliance

Cc:

Chris Winter - Executive Director, Access Fund

Erik Murdock - Policy Director, Access Fund

Joe Sambataro - Northwest Regional Director, Access Fund