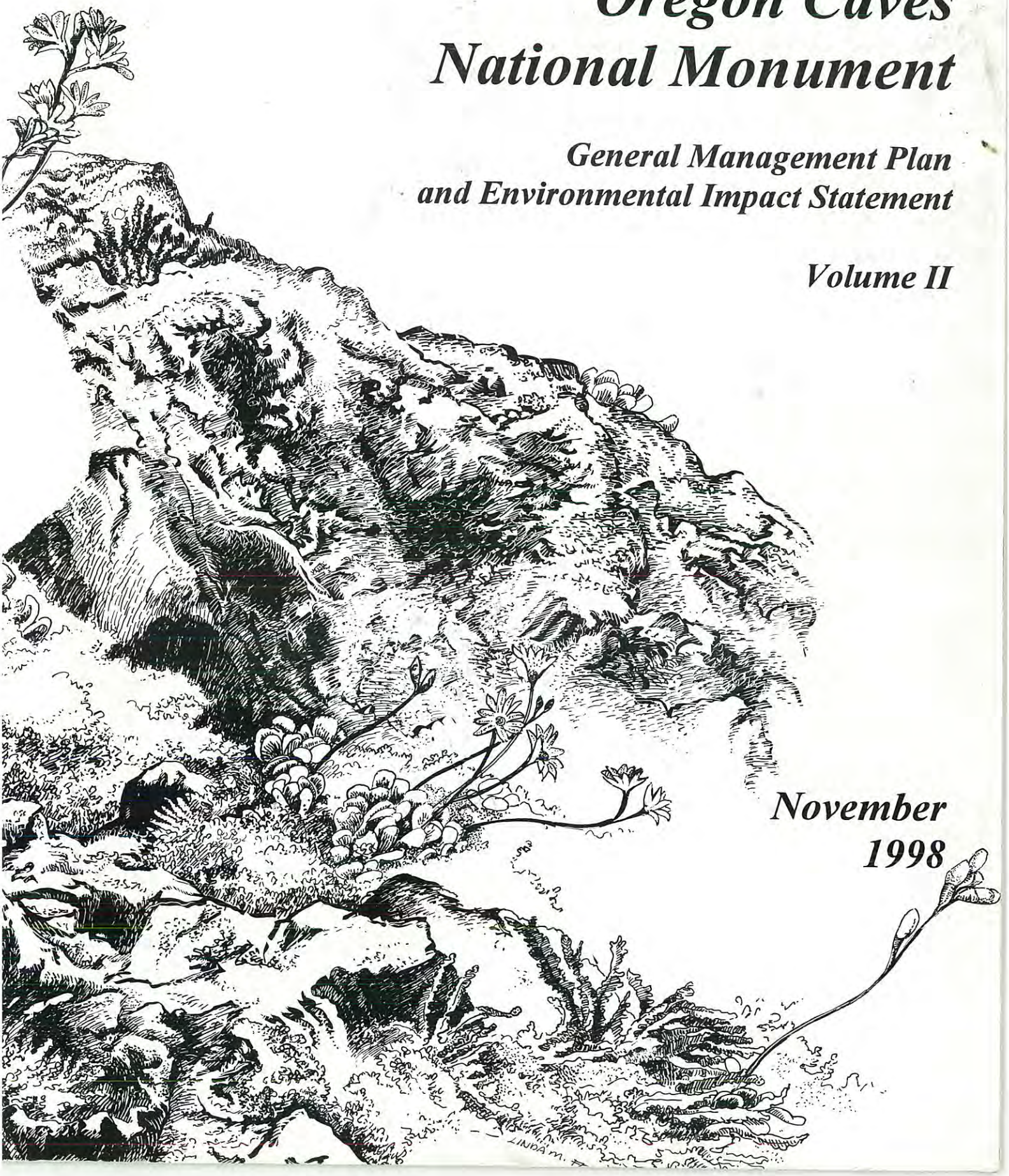
Oregon Caves National Monument

General Management Plan and Environmental Impact Statement

Volume II



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Volume II
Comments and Responses for
General Management Plan and
Environmental Impact Statement

for

Oregon Caves National Monument

Prepared by
U.S. Department of the Interior
National Park Service

Volume II is a summary of public involvement and an essential part of the final *Oregon Caves National Monument General Management Plan and Environmental Impact Statement* (GMP/EIS). Volume II should be read in conjunction with Volume I, which includes the final general management plan, development concept plans, and environmental impact statement.

Information in this volume includes information on scoping meetings, the distribution and notice of availability of the draft GMP/EIS, public workshops held on the draft GMP/EIS, and finally, written comments and responses by the National Park Service. All oral and written comments were considered by the National Park Service according to the requirements of 40 CFR 1503.

A notice of availability of the draft GMP/EIS was published in the *Federal Register*, on January 16, 1998 (Volume 63, Number 11, page 2676). Approximately 500 copies of the document were distributed to governmental agencies, elected officials, public interest groups, businesses, media, local libraries, and individuals. The document also was available on the Internet. Newsletters were distributed within the adjacent community to summarize the draft document.

Written comments were accepted through March 13, which was the close of the 60-day public comment period for the draft document. However, comments received at the Monument by March 27 were included in the official record. During the public review period, approximately 111 people participated in four workshops conducted in early February in two communities in Oregon. In addition, 982 letters were received. The National Park Service greatly appreciated the time and effort that people took to participate in the review of the draft document and to comment on the proposals.

The NPS addressed the public comments and concerns in two ways. There is a Response to General Comments section that addresses some recurring comments from the workshops or letters. In addition, in The Responses to Public Comments section of this document, letters were reproduced and the NPS responded to specific substantive comments. These letters are organized beginning with comments from federal and state agencies, state and local governments, elected officials, organizations, and letters from individuals.

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Siskiyou Fritillaria
(*Fritillaria glauca*)

Summary of Public Involvement

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A Notice of Intent to prepare an environmental impact statement for Oregon Caves National Monument was published in the *Federal Register* on January 23, 1996 (Volume 61, Number 15, pages 1783-1784). In early March, a newsletter was produced by the National Park Service and distributed both to individuals on the Monument's mailing list and to readers of the *Illinois Valley Newspaper.* (Newsletters were inserted into the newspaper which has a circulation of about 3,400 people.) The purpose of the newsletter was to provide the following information: explain the general management planning process to the public, relate relevant information about the Monument, provide dates, time and location for the public scoping meetings, and encourage public participation and comment on issues or problems that needed to be addressed at the Monument.

In accordance with NPS responsibilities with the National Historic Preservation Act, the Oregon State Historic Preservation Officer and Advisory Council on Historic Preservation were notified in June 1996.

To fulfill the compliance requirements for the Endangered Species Act (Section 7 Consultation), the U.S. Fish and Wildlife Service was notified in March 1996. A list of threatened and endangered species that occur within the area of the Monument were sent to NPS.

Scoping Meetings

Two public scoping meetings were held in March 1996. The purpose of these meetings was to identify additional issues that should be addressed in the GMP/EIS. The first meeting was held from 7:00-9:00 p.m. on March 19 at the Illinois Valley Senior Center in Cave Junction, Oregon. Fourteen people attended as interested private citizens or as representatives of the following organizations: Siskiyou Education Research Project, Friends of Caves, Illinois Valley Senior Center, Estey Corporation, Oregon Caves Company and the National Park Service.

A second meeting was held from 7:00-9:00 p.m. on March 21 at the Grants Pass City Council Chambers in Grants Pass, Oregon. In attendance were nine people representing Oregon Caves Company, Estey Corporation, and the NPS.

Individual meetings were held by the NPS planning team with several interest groups at their request. On the morning of March 19, in Cave Junction, Oregon, the GMP/EIS planning team met with the concessioner, represented by Estey Corporation and Oregon Caves Company. Later that afternoon, the NPS met with the Illinois Valley District Ranger Office, Siskiyou National Forest, USFS. In attendance were the district ranger, a wildlife fisheries biologist, district fire officer and an assistant recreation staff member.

On March 21, the NPS met with conservation group representatives of the Siskiyou Regional Education Project, Rogue Valley Audubon, and Siskiyou Audubon. In the afternoon, NPS planning team met with the USFS, Siskiyou National Forest Supervisor's Office in Grants Pass. In attendance were the forest supervisor, the chief of planning, and a natural resource staff member.

During the public scoping period a total of 88 letters were received from 12 states, with 56 letters coming from Oregon. The primary issues expressed were a need for the following: a boundary expansion to protect the cave and surrounding natural resources; protection of the viewshed from clearcutting, and other USFS management activities into surrounding lands as seen from the Monument; shuttling of visitors from the Illinois Valley Visitor Center to the Monument; expanding recreational opportunities within the Monument and adjacent areas; and providing an on-site visitor center to interpret the natural history of the region.

Distribution and Notice of Availability of Draft GMP/EIS

Over 300 copies of the draft GMP/EIS were mailed to agencies, organizations and interested individuals the first week of January 1998. In addition, documents were sent to local libraries in Cave Junction, Grants Pass, and Portland, Oregon. A notice of availability of the draft GMP/EIS was published in the *Federal Register* on January 16, 1998 (Vol. 63, No. 11, page 2676). Notices of the document's availability were sent to the news media in the communities surrounding the Monument. The public comment period deadline for comments on the draft GMP/EIS was March 13, 1998 and any comments received at the Monument by March 27, 1998 were included in the official record.

To coordinate with the mailing of the draft GMP/EIS, a newsletter was prepared featuring a summary of the draft plan and included the times, location, and dates of the February public workshops. A total of 4,500 newsletters were printed. Each newsletter included a mailback postage-paid response form to make it easier for people to provide comments concerning the plan. Approximately 3,500 newsletters were inserted into the *Illinois Valley News* (circulation of 3,400 subscribers) on January 14, 1998, and another 1,000 newsletters were made available to Monument visitors at the Illinois Valley Visitor Center and the Chateau. In addition, newspapers in Grants Pass and Cave Junction, Oregon published the notices and local radio stations also announced the locations and times for the public workshops described below.

Public Workshops on Draft GMP/EIS

The initial notices of availability also announced the schedule and location of the four public workshops that were organized to offer the public an opportunity to meet with NPS staff and planning team members to discuss the draft GMP/EIS. The location, time and date of the workshops were as follows: Illinois Valley Senior Center, 2:00-4:00 p.m. and 7:00-9:00 p.m., Monday, February 9, 1998; and Grants Pass City Council Chambers, 2:00-4:00 p.m. and 7:00-9:00 p.m., Tuesday, February 10, 1998.

A total of 111 persons attended these workshops. The following organizations: Illinois Valley Tourism Consulting Committee, Oregon Caves Company, Fordson Home Hostel, Illinois Valley Family Coalition, Southern Oregon Grotto, Illinois Valley News, Back Country Horseman, National Parks and Conservation Association, Illinois Valley Garden Club, Sierra Club, Illinois Valley High School, Out 'N' About, Rockydale Neighborhood Association, Takilma Community Association, Siskiyou Regional Education Project, Rough and Ready Lumber, Jackson County Horsemen Association, Greenway Equestrian Horse Trail, Audubon Society, Josephine County Sheriff's Posse, Josephine County Historical Society, Spalding & Sons, Inc., Southern Oregon Timber Industries Association. A summary of public comments follows that were made at the workshops.

Summary of Public Comments from Workshops

The summary has been divided into topic areas that were discussed as part of the public comment. Following this summary, a complete listing of each individual comment recorded on flip charts at the four public workshops is also presented.

Watershed and Viewshed Protection

Boundary Expansion

The proposed expansion of the Monument was supported by a large majority of commentors. The main reasons cited for support of an expanded Monument boundary were the need for a necessary extension, the need to protect the watershed for drinking water and cave system, protecting old-growth and surface features and animals and wildlife, and a halt to logging operations on the adjacent lands.

Several areas were suggested for boundary expansion and included the following: southern extension (to include Sucker and Limestone Creek watersheds noting concerns about watershed, viewshed and wildlife, logging , grazing and future road building, traffic within serpentine areas, and fire from USFS land); the Grayback drainage; Mt. Elijah (for its spectacular views); Bigelow Lakes (to ensure water quality downstream to Monument); roadless areas along the Applegate-Illinois Divide (on both sides of the divide from approximate Tannin Mountain to Sugarloaf Mountain including headwaters on east side of the divide); caves in adjacent watersheds; and Siskiyou National Forest (transfer entire national forest to NPS).

Some persons voiced their disapproval of any Monument expansion. One commentor stated that expansion had been discussed many times in past and rejected because added lands were unnecessary. Another person stated that the Monument was originally created to protect caves, and existing acreage is adequate for protection. The entire watershed for proposed action is excessive according to another commentor. Since NPS and USFS are both federal agencies, it was mentioned that the two could jointly work to protect watershed areas of concern. Other attendees suggested that the USFS would manage lands consistent with the values of the NPS; in Siskiyou National Forest plans, protection of the cave resources has always been a high priority.

Natural Resources

Proposals regarding natural resources included closing the Monument in the winter to recreation to protect animals, protection of the Port Orford cedars in the watershed by NPS, and elimination of grazing on the east side of Monument to protect water supply (from giardia and cryptosporidium).

Economic Issues

Concerning timber harvest, some requests were made to have comparable acreage/timber volume available in other LSR designated areas within Siskiyou National Forest in case of boundary expansion of the Monument.

Hunting

It was stated that the proposed Monument expansion will take away prime historic hunting areas (such as Buck Peak and Bigelow Lakes) and some commentors requested to keep these areas available for local uses. Some commentors preferred the current USFS management of land over the two alternatives which would eliminate hunting from an expanded Monument.

Horse Use

There were several requests to continue private and outfitter horse use on the trails within the expanded boundary. Commentors wanted horses to be kept on trails, with feed and use restrictions applied. There were concerns expressed about horse use such as the importation of weeds and the adverse affects on trail conditions. A request for a horse camp inside the proposed Monument was suggested, including the need to develop trailheads for horse use. While there was a request to make Bigelow Lakes available for horse access, there was also one to close this area to all except foot traffic.

Road Access and Trails

Concerns were expressed about road access along the boundary of the Monument such as maintaining road access to the trailheads of Bigelow Lakes, Mt. Elijah and Lake Mountain. One commentor suggested that an alternative loop and bridge to cross Lake Creek should be provided.

Complaints were made about too many gates in the area. Another request was to close all roads possible and revegetate them into the proposed expanded boundary. The opening of more trails and campgrounds was proposed (such as the extension of Big Tree to the parking area, connecting No Name Trail to Cliff Nature Trail and Bigelow Lakes to Panther Creek Trail). Further suggestions included a geologic interpretive walk along the drive and the expansion of the proposed NPS boundary area to accommodate more trail opportunities away from clearcut areas.

Public Facilities

Several commentors stated that NPS rangers should run the Monument, conduct cave tours, and control all possessory interest in the Monument, and agreed that food and lodging services should be provided by a concessioner. Some questioned the economic viability of the alternatives involving a reduced operating season, increased operating budget, increased staff, and smaller tours. One commentor stated that the NPS is proposing more facilities, more money, more land, but are making the Monument open less of the year to the public. There was also the concern that NPS buy out possessory interest will reduce income (taxes) to Josephine County. While some are happy with concession operation of food service and lodging at the Chateau, others don't see a need for lodging in the Chateau and just want it used for visitors services, interpretive programs, and other uses. Some commentors suggested that the administrative site should be included in the proposed boundary and new NPS housing added.

One commentor proposed that the NPS become part of the "Snow Park" program and nordic activities should be offered to the public in winter. Some concern was expressed about the duplication of the visitor center function. Others suggested more interpretive facilities at both the cave and the Illinois Valley Visitor Center (IVVC) and a meeting room for community groups in the IVVC. Additional suggestions were to consider a mounted horse safety patrol (volunteers) for future use in the Monument to enhance trail safety to the public. Also, there was a suggestion to have an Elijah Davidson interpretive panel describing the account of the discovery of the caves and to tell where he is buried (Williams, Oregon at the Sparlin Cemetery). One comment suggested turning the site into a National Park instead of a National Monument to improve publicity for the area.

Transportation suggestions included initiating a bus shuttle service or a narrow-gauge railroad from Cave Junction to the Monument. Considerations were suggested to close the road between the parking lot and the Chateau to traffic during peak hours for visitors. Also, a need to put priorities on disabled access and services

was stated (such as road guides and direction to unpublicized vista points).

Cave Tours and Programs

Several commentors thought that cave tours should be lead by professional NPS trained employees instead of present concession guides. They commented that the National Park Service would be able to provide better protection of cave formations (many formations have been removed or damaged recently), and provide a greater educational experience.

Other commentors, however, would like to maintain the concession led cave tours. Several stated that concession guides are qualified to do the job, are audited by NPS, and able to handle the visitor traffic. Any NPS operated tours would be fewer in number of tours, would not accommodate visitor demand, and would ultimately result in lower visitation because visitors would not be willing to put up with the wait to get a tour. Other concerns about transferring the cave tours to the NPS revolved around potential effects on the Illinois Valley area economy and local hiring. Others stated that revenues from cave tours should remain within the Monument to maintain trails and other facilities.

One commentor stated that the NPS should establish the viability of a scaled-back concession operation (minus cave tours), through a feasibility analysis, before articulating a preferred alternative in the GMP. Others suggested that if NPS staff did not take over the concession operations, then tighter quality assurance standards should be imposed on the concessioner regarding staffing levels, maintenance and upkeep, and minimization of clutter in lobby. Also, retail shops, hotel lobby, and reservation desk should be managed to upgrade appearance, reduce clutter, and eliminate junk items from gift shops.

Some commentors stated that winter closure to support cave preservation is important and should be primary over tourist concerns. Total numbers of people in caves should be kept to a minimum to protect bat population and to protect the cave. But there were also some concerns about winter cave closure and the impact on area tourism particularly if the cave were closed prior to the Christmas holidays. It was mentioned that cave tours should be continued year round but the number of tours limited in off season, as they are now.

Suggestions were made for more cave tour packages and a tour of the historic district. Also the need for "family" tours for family groups with small children and day care services was expressed.

Oregon Willow Herb
(*Epilobium oreganum*)

Written Comments and Responses

Written Comments and Responses

At the close of the public review period on March 27, 1998, a total of 982 pieces of written correspondence had been received by the National Park Service from government agencies, organizations and individuals in response to the draft *Oregon Caves National Monument General Management Plan and Environmental Impact Statement.* The correspondence received included 735 individual written letters, individually signed form letters and postcards, 132 E-mail responses through the Internet from our NPS posted webpage, and 115 postage-paid mail-back response forms containing public comments from a plan summary newsletter which was distributed to 1,000 Monument visitors, and 3,500 Illinois Valley residents through an insert in the *Illinois Valley News.* In addition to individual correspondence, the National Park Service received a petition signed by 102 persons regarding the issue of the proposed boundary expansion of the Monument.

This section of the comment and response section is divided into three main parts. The first section is a summary of the written comment to complement the summary of comments received from the public workshops listed earlier. The second section includes NPS responses to general comments that were made by several organizations and individuals, and are grouped together for ease of reference. The third section includes the reproduction of 69 letters which had substantive comments not addressed under the general comment section.

The original set of the 982 comment letters are part of the official administrative record for this project and have been retained at the administrative offices of Oregon Caves National Monument. Copies of the letters have also been placed in the NPS Columbia Cascade Support Office library located at 909 First Avenue, Seattle, Washington.

Summary of Public Comment from Written Responses

A large majority of the public comment received on the draft GMP/EIS (844 out of 982 total responses) indicated support for the NPS Preferred Alternative, Alternative C. Alternative C also constitutes the Proposed Action in the final GMP/EIS. This support was expressed mostly as general support for all elements of Alternative C. Many of these persons commented on the need to protect the cave, the public water supply and scenic views from the Monument. Support was also evident for other elements of the proposal, including the development of an on-site visitor center, protection of the historic character of the National Landmark District around the Chateau and Chalet, expansion of the Illinois Valley Visitor Center, and having National Park Service rangers guide visitors through Oregon Caves National Monument.

In addition to these comments, some respondents indicated support for other alternatives other than the Proposed Action. A total of 38 respondents favored the No Action Alternative, Alternative A; four respondents favored Alternative B; and one respondent favored Alternative D.

A total of 575 respondents, a majority of the 844 total respondents favoring Alternative C, specifically called for the NPS to consider a larger boundary change for the Monument than the proposed 3,410 acre addition. In some cases, respondents suggested consideration of a modest boundary change to the Monument boundary to

expand southward to incorporate a logging road that is located in the Siskiyou National Forest along the southern boundary of the Monument. However, most respondents favored a much larger Monument boundary calling for a more substantial change encompassing a 48,000 acre addition to the Monument. This 48,000 acre addition to the Monument would involve all the federally owned land within the Sucker and Grayback Creek watersheds for purposes of protecting a broader ecosystem environment. Most of these lands are managed by the Siskiyou National Forest. The respondents indicated that in order to better protect old-growth forest characteristics in and around the Monument requires the protection of larger areas of the forest than either the Monument currently provides, or the boundary expansion included in Alternative C.

However, not all commentors favored a boundary change. Some respondents voiced concerns and questions about how the NPS would manage the area once it was brought into the Monument. A few individual letters opposed any boundary expansion, and a petition was sent to the Monument, signed by 102 persons who opposed expansion of the Monument. The NPS did not validate these signatures.

There were also a number of comment letters which raised specific issues or topics of concern about a specific element of the Proposed Action, Alternative C. There was general support for NPS rangers assuming responsibilities for guiding visitors through Oregon Caves. However, while the majority of comments reflected this view, the current concessioner, the Oregon Caves Company, along with a number of other respondents totaling 74 respondents in all, urged the NPS to reconsider its proposal, and retain the current Monument practice of contracting out cave guide services to a concession contractor to conduct public tours of Oregon Caves. While the proposal would retain concession services in lodging, dining, and gift sales at the Monument, these respondents felt that the current concession guide service was good, that it should be retained, and that it was not necessary to have NPS ranger interpreters give tours through Oregon Caves as is included in the Proposed Action, Alternative C (and also listed in Alternative B). Many of these respondents also expressed concern that a loss of concession income from guide services could result in a potential loss of income and tax revenues to the local area if concession guide services are replaced with NPS ranger guides.

Some respondents suggested that the cave tours along with Chateau lodging and dining operations be extended through the Christmas holiday season. Others expressed concern about the length of the period of proposed closure of the cave to public tours during the winter months.

A few respondents were specifically concerned that a boundary change would preclude recreational hunting opportunities in an area of the Siskiyou National Forest which has traditionally been open to hunting. Eight respondents specifically asked for a consideration to continue to permit hunting in the area if the Monument boundary were to be expanded.

Fifteen respondents called on the NPS to permit motorized trail use on certain designated trails within the expanded Monument in addition to motorized use on established roads.

The Monument received a significant number of comment letters from horse clubs and individuals interested in continued recreational horse use of the area. A total of 40 respondents specifically urged the NPS to continue to permit horse use on those trails within an expanded Monument area that have been traditionally used by horses. These groups urged the NPS to be more specific about the permitted use of horses on designated trails within the expanded Monument in the final plan.

Finally, the issue of moving gift sales to the Chateau and freeing up space in the lower level of the historic

Chalet building was generally supported, with a few persons concerned that the gift sales area not detract from the historic feeling of the Chateau. The notion of peak hour shuttling of NPS, concession and cooperating association employees residing in the Illinois Valley to the Monument in order to save parking spaces for visitors, was also supported by several commentors.

Other elements of the proposal either received broad public support through affirmation of general support for the Proposed Action, Alternative C, or proved not to be controversial. These elements included improvements to the Illinois Valley Visitor Center, the development of a new on-site visitor center in the Chalet, improvements to the public parking areas, encouraging pedestrian use of the drive between the main parking lot and the cave entrance, and the construction of replacement Monument offices, curatorial storage, and improved housing for NPS and concession employees.

General Comments with NPS Responses

The following section contains general comments from the public which were repeated in numerous individual pieces of correspondence and are summarized here. A NPS response to these comments is also provided in each instance.

1) Shuttle system—Full consideration was given to establishing a shuttle system to transport visitors and employees to and from the Monument from the City of Cave Junction. An employee shuttle system for National Park Service, concession and cooperating association employees is part of the proposed action.

A visitor shuttle was considered, and in fact was originally studied in 1979. Due to distance factors, the required frequency and number of shuttles needed to provide reliable visitor service, and variation in the numbers of daily visitors, it was determined that the establishment of a regular, publicly funded shuttle service would not be practical. It would require extensive public expenditure in shuttle facilities, buses, employees and other operating costs and other expenditures.

Regarding the transportation of lodge patrons and other visitors to and from the Chateau, the concessioner would be encouraged to examine the feasibility of an on-demand shuttle service from the IVVC.

2) Security system—Subsequent to the release of the public review draft, the Monument staff have incorporated additional improvements in the cave security system. The electro-magmatic locking system is continuously monitored to provide a record on legal ingress and egress, unauthorized attempts to enter the cave, status of lock system, and alarm for system malfunction. While no security system is foolproof, the present system has enhanced security compared to a simple lock and key system. Additionally, gates and entrances have been hardened to further discourage illegal access. No additional plan actions related to cave security are proposed.

3) Typographic and editorial comments—Several letters noted typographical errors and requested various editorial changes. These were not substantive changes. In these instances, text changes may have been made, but the comment letter was not reproduced in order to save paper and printing costs.

4) Concessions—Some commentors discussed options for various concession services including deleting food, lodging, and gift sales from the Monument, or, on the other hand, retaining existing services such as

fine dining and lodging in the Chateau. Considerations were fully given to these and other options regarding concession services and many were incorporated in the environmental impact statement alternatives. The proposed action calls for retaining a range of concession services that are necessary and appropriate for the Monument. This includes retention of lodging and food service in the Chateau, and continuing gift sales, but in a new location. The proposal to continue concession services was made in part to support a traditional use of a national historic landmark property and furthering historic preservation through active use. This use is also cost-effective for the federal government.

5) Range of alternatives—There were several comments stating that the NPS did not consider a full range of alternatives. The NPS provided a sufficient range of alternatives for each topic. For example, concession options in Alternative A would leave the concession services as they presently exist; Alternative B would delete all concession-run services; Alternative C would keep the concession-run lodging and food services; and Alternative D would establish a nonprofit or cooperating interpretive association to provide the cave tours, but other concession-run services would remain. All alternatives must be viable, but can be packaged in different ways. Also, one element of one alternative can be considered in consort with another element from another alternative.

6) Horse use—Horse use would be permitted within the expanded Monument on those trails which have traditionally been available for horse use. This includes Lake Mountain Trail, Meadow Trail, and Limestone Trail. National Park Service management of horse use would strive to provide for a high quality recreational experience for horse trail users while protecting Monument resources and public water supplies. Items such as protection of stream crossings and working with outfitters to utilize weed-free hay are examples of the measures that would be considered. Mounted volunteer safety patrols also may be considered. The NPS would work closely with horse user groups on these and other issues. Future site planning would be needed to establish trailhead facilities for horse use in appropriate locations.

Any commercial horse use activity within the Monument would require a permit instrument from NPS even if the use begins outside of the Monument boundary. Issuance of permits would need to be determined on a case by case basis.

7) Provide alternative loop trails and identify trails that will be available for horse use—All existing trails currently open to horse use within the proposed expanded boundary would remain open to that use. Language has been added in the plan to clarify this point. A study will be conducted to determine what restrictions may be necessary in the Lake Creek watershed to allow continued use by horses while protecting resources. For example, requiring the use of weed free feed and "hardening" of stream crossing or constructing small bridges to prevent erosion would be considered. A study will also be conducted to evaluate the use of the section of Limestone Trail, currently within Monument boundaries, for special horseback access to the Bigelow Lakes area. One such special use could be for limited access for handicapped or mobility impaired horse users.

8) How can you have a simple cave in a complex region?— Any detailed mapping in a heavy forested mountainous region is going to be a somewhat inaccurate and slow process. More current research and mapping (1997 to present) has discovered extensions of the Monument marble unit(s) by field and hand analysis (thin sections are being prepared), that show relationships to marble on Lake Creek, in particular to the northeast Monument pod, as being one and the same. Also the pod in the southwest corner is larger than currently mapped and has a good chance of being part of the longest arm of the Monument marble. This pod

also has a strong consistently flowing stream that emerges from marble, from a southern direction, hinting of a larger undiscovered pod than is currently shown on any existing map.

There are at least three pods of marble, one with dark inclusions from muds; one with green inclusions from chlorite/muds with pyralsapite garnets, and the marble in the known cave containing blue inclusions from muds and other sources. All three are found on the Monument and are showing relations to pods and lenses that are being found on the Monument.

There is a known area of water flow, but even this has now been proven by current mapping to be lacking, expanding the knowledge of previously known water source or sources, and in some cases being entirely unknown and never appearing on any previous mapping of the area. Current research in 1998 has turned up evidence that water emerging from the main cave entrance is flowing contrary to measured dipping of strata, flowing along strike. Two years of higher than normal precipitation has provided excellent opportunities to expand knowledge of the area's water sources. A few of the "known" sources have been mapped as only one source, only to be shown and mapped as actually a series of springs with only one being the main spring which will not dry up during a prolonged dry season, though it will reduce its flow. One spring has never been mapped, six creeks have been inaccurately mapped, showing continuous water flow instead of karstic and seasonal flow extent. The water flow of River Styx ean appear not to lose discharge during a dry season unless there is another source. Dye traces have been done, but more traces should be conducted at other possibilities and even at a few seemingly odd sources. Water flows that are subterranean will follow the path of least resistance, but when forming caves it is known to flow across active faults, cut across bedding planes, backtrack (to lower levels) and in general, defy conventional, traditional understanding of water. Water originates from the springs above Limestone Creek, springs above Bigelow Lakes, or another location.

The "known" water influencing the cave is not well documented, or understood. It is a separate topic from public health and safety, Monument flora and fauna, and fire control; but all are intimately connected.

9) Revise restrictions and provide other events, festivals—Special events and activities on the Monument and other NPS sites are appropriately restricted to those which have some direct connection to the purpose and mission of the area. Special events or activities that are sponsored simply to promote increased visitation on or around the site are inappropriate and would not be approved as contributing to the mission of the Monument.

10) The need to provide for childcare—Although day care services were previously provided under concession contract, it was determined as unfeasible to continue this service. Stringent guidelines from the state of Oregon and insurance companies exist as to provision of child care to the public. Far too few visitors require this service to allow a contractor or the NPS to offer this service without incurring significant costs. These costs cannot be recovered by charging a fee for the service. Such a fee would be so high as to completely discourage visitors from using it.

The NPS is exploring the option of providing "family tours" that would allow visitors to take small children into a limited part of the cave. Due to the nature of visitation at the Monument, these special tours could present logistical problems that would further limit access to the cave by the large number of the general public arriving during peak periods. If feasible, NPS would initiate these special tours with its expanded guide staff.

11) Decrease in cave tours due to high price—While there is a positive correlation between increases in concession cave tour fees and declines in visitation over the past 20 years, NPS has no conclusive evidence that higher rates have directly reduced visitation. A comprehensive study would be needed to better confirm this theory.

12) Close park in winter because animals need places to go—There is no evidence that the limited use which occurs on the Monument during the winter season has any effect on native wildlife populations; most of which are inactive during that time period.

13) Who will fight fire?—The NPS would be responsible for all fire management activity within the expanded Monument. The existing cooperative fire agreement for mutual response between USFS and NPS would be valid within the expanded area. The NPS would pursue a proactive role in fire management in the area including a program of prescribed burning to reduce hazard fuels and re-establish historic forest types. Because of the small size of the area, it is likely that a full suppression option would be implemented for the area with regard to both natural and man caused fires.

14) If NPS expands boundary, set aside comparable acreage for timber volume in other LSR—This action is beyond the scope and authority of the NPS. However, since LSRs are supposed to be managed to enhance old growth characteristics, the USFS has stated that it does not plan extensive harvesting in the proposed expansion area. If any sizable replacement volume is needed, it would be up to the USFS to identify potential areas within the SNF that could provide that volume while meeting the guidelines of the *Northwest Forest Plan*.

15) Who will maintain trails in the Monument?—Trails would be maintained by paid NPS maintenance personnel and by volunteers. Trails will be maintained according to NPS standards for back country trails.

16) The NPS should do a concession feasibility analysis—This analysis was completed by the NPS Concession Program Division, Denver, Colorado. The results were that a reconfigured concession operation is feasible.

17) If not operated by NPS then tighter standards should be imposed upon the concessioner—Any proposed concession operations would be monitored and evaluated using NPS servicewide standards. The gift shop will be required to develop a mission statement that calls for all activities and sales to be appropriate within a national monument.

18) The NPS should acquire all federal lands in the Sucker/Grayback watershed—Full consideration was given to a boundary larger than the 3,410 acre Monument boundary addition that is included in the Proposed Action. It is acknowledged that a larger 48,000 acre Monument boundary encompassing all federal lands within the Grayback and Sucker Creek watersheds would provide for the long-term protection of the natural and scenic resources included within these watersheds. However well-intentioned as this preservation strategy may be, it is inappropriate for NPS to consider boundary changes to an existing unit of the National Park System where such changes would be outside the purpose, or reason, that the park unit was established. A boundary increase of this magnitude is not necessary to protect the natural values of Oregon Caves and surface resources, the National Historic Landmark District, the Monument's public water supply, or the scenic qualities of the area as defined by the foreground and middleground viewshed as seen from the Monument. Therefore, consideration of a 48,000 acre addition is considered to be outside of the scope of the

Oregon Caves National Monument General Management Plan .

The broader issue of protecting portions of the Siskiyou Region Ecosystem should be addressed in other appropriate forums and to other public land management agencies that have responsibility for the management of those resources.

Please also reference the Alternatives Considered but Rejected section in the Alternatives chapter.

Letters Containing Substantive Comments with NPS Responses

This section that follows contains letters which have made substantive points regarding information contained in the draft GMP/EIS. These letters have been reproduced, and individualized detailed responses to these comments have been provided by the NPS in many cases.

The reproduced substantive comment letters have been intentionally organized into the following groupings and sequential order: letters from federal elected officials and agencies, state elected officials and agencies, local elected officials and agencies, organizations, businesses and other groups, and individuals.

It should be noted that these 69 reproduced letters are not necessarily representative of the scope of all the comment letters received, but do present issues and questions for which it was determined that individual responses were appropriate.

Each distinct comment is numbered and bracketed. The response of the NPS to each letter appears on the right side of the page with the responses numbered to correspond to the comments. If the issue has been discussed in the general responses, the reader may be referred to that discussion; if the comment has been answered in the previous letter, the reader may be referred to that earlier response.

COMMENTS

L-131

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Roseburg Field Office
2900 NW Stewart Parkway
Roseburg, Oregon 97470
(541) 957-3474 FAX: (541) 957-3475

RECEIVED
MAR 12 1998
OREGON CAVES NATIONAL MONUMENT

Reply to: 8330.0882 (98)
Log#:1-15-98-TA-088
x-ref. 1-7-96-SP-159

March 10, 1998

Memorandum

To: Craig W. Ackerman, Superintendent
Oregon Caves National Monument (Monument), National Park Service

From: Craig Tuss (Craig A Tuss)
Field Supervisor

Subject: U.S. Fish and Wildlife Service (Service) review and comments on the Draft Oregon Caves National Monument General Management Plan and Draft Environmental Impact Statement (DEIS)

14

Thank you for the opportunity to comment on the Draft Oregon Caves National Monument General Management Plan and DEIS. The following comments are provided to assist you in strengthening the document. These comments have been coordinated with the Service's Oregon State Office.

The Service favors having National Park Service personnel present guided tours under the preferred alternative in this DEIS because it will likely present a high quality and consistency of information with respect to fish and wildlife resources. While the Service generally supports the Monument's choice of Alternative C as the preferred alternative, some unresolved questions remain.

General Comments

1 The DEIS indicates that forest stand management under Alternative C would be directed toward maintaining a climax ecosystem and would also emphasize restoration. While impacts resulting from grazing and other multiple uses of the Siskiyou National Forest (SNF) lands that are proposed for acquisition may be eliminated, different impacts may be introduced under the Draft General Management Plan. For instance, the current Late Successional Reserve (LSR) status of some of the proposed acquisition allows mechanical thinning to accelerate the development of late-successional forest structure. If young plantations acquired from the SNF are not treated, they may not attain late-successional characteristics for many centuries. Furthermore, treatment by prescribed burning in these stands or other stands with excessive fuel loads, may not be feasible without a mechanical pre-treatment. Changes in the planned structure of these forest

RESPONSES

Letter 1: U.S. Fish and Wildlife Service, Roseburg Field Office

1. National Park Service policies call for providing the highest protection possible for endangered species. If these protection measures call for some type of forest manipulation, the NPS would be prepared to use various forest practices to reach this goal. The Monument is already working with other national parks, such as Redwood National and State Parks, and Crater Lake, to deal with these issues, along with many federal and state agencies.

   Management of the 3,410 acres within the expanded Monument would place emphasis on the permanent protection of resources, including natural processes resulting in old growth climax communities. While this acreage would be deleted from Late-Successional Reserve designation, this area would be included in a Congressionally Reserved Area which provides the highest level of protection. The NPS preservation strategies would provide long-term beneficial effect to spotted owls and other species. Additionally, as part of NPS management practices, and in coordination with other agencies, including the USFS, USFWS, National Marine Fisheries Service, Oregon Division of Wildlife, and others, the NPS would implement forest management practices to enhance wildlife habitat and old-growth characteristics through various means. Proven fire management practices would also be employed in this area.

2. These agencies have been added.

3. The definition of "Full Retention Visual" means that harvesting activities would not be evident to the visitor. It is intended as an overlay over USFS allocations in areas of sensitive visual quality. Since LSRs and Botanical Reserves can allow commercial and noncommercial thinning, salvage, and potentially road construction, the NPS added the Full Retention Visual as a means to ensure added visual protection to Alternative B.

4. The word "migration" has been changed to "movement".

5. The statement has been amended.

6. This section has been corrected and updated with new information provided by the Regional Ecosystem Office's Reserve Assessment Work Group. Please see new language added.

COMMENTS

1 lands will also affect baseline data for the northern spotted owl that the Service tracks for the purpose of Section 7 consultations under the Endangered Species Act (Act) of 1973, as amended. How would the proportion and amount of northern spotted owl habitat types in different stages of growth be affected as a result of the proposed acquisition? What are the possible effects to the northern spotted owl under this DEIS and its supporting documents, such as the proposed Fire Management Plan, if LSR lands are changed to a Congressionally Withdrawn status?

Specific Comments

2 Page 14, bullet 7 states that "Consultation with the public, USFS, and Oregon Fish and Game Commission would continue as required by State and Federal law." The Service recommends that the U. S. Fish and Wildlife Service, the National Marine Fisheries Service and the Environmental Protection Agency be added to this list.

3 Page 29, paragraph 1 and page 59, paragraph 6. Some clarification in Alternatives B and D is needed regarding applying the SNF's management allocation of "Full Retention Visual" to all lands designated as a "protected area". The Service assumes that this allocation would not apply to those lands currently in a designation that affords greater protection than Full Retention Visual, such as Late Successional Reserve (LSR) or Botanical Reserve designation.

4 Page 79, last paragraph, sentence 2. Consider rewording the statement that the unnatural concentrations of jays and ravens, "may have caused migration of the northern spotted owl..." to indicate that ravens may have excluded northern spotted owl use around the developed area. Northern spotted owls do not migrate.

15

5 Page 82, paragraph 3, sentence 3. The statement, "Fire suppression would require emergency consultation (if in a proposed critical habitat) for spotted owls or other T&E species..." needs clarification. The Service assumes the mention of critical habitat refers to the statutory designation of critical habitat as defined in the Act. If so, two important distinctions need to be made. First, critical habitat for the northern spotted owl is no longer in the proposed stage of designation, but has completed the final process of designation through a final rule published in the Federal Register (January 15, 1992). Second, consultation procedures (emergency or otherwise) are required under the Act if there is an effect on any federally listed species or their habitat, not just on critical habitat. If the monument requested consultation with the Service under Section 7 of the Act on the proposed Fire Management Plan, emergency consultation would then only be needed for impacts not considered by the Fire Management Plan.

6 Page 106, paragraph 3, last sentence. The DEIS states, "LSR's have to maintain a canopy closure of 40% or greater. The LSRs should also have greater than 40 trees per acre." The Service is unaware of this LSR management standard in the Northwest Forest Plan Record of Decision and Standards and Guidelines (ROD). The citation page from the ROD would be helpful here, or, if this is based on a more specific interpretation (such as in the SNF's LSR Assessment), the citation of that document would be helpful.

Page 137, paragraph 4, last sentence. The statement "Snag maintenance requirements are not mandated for LSRs in the Northwest Forest Plan (Anderson 1996: p.41)" doesn't fully portray the requirement or intent of management in LSRs. While the ROD does not specify numbers of snags to retain within LSRs, it does state that snags and coarse woody debris need to be retained

RESPONSES

7. It is the intent of the NPS to conduct recommended cave monitoring.

8. A new updated species list has been obtained from the U.S. Fish and Wildlife Service and can be found in Appendix C.

9. The determination of no adverse affects on federally listed species can be found in the Environmental Consequences chapter, Effects Common to All Alternatives section.

to provide for late-successional and old-growth forest structure and processes (ROD, pages B2-B6). Retention of snags and coarse woody debris during salvage operations in LSRs is specifically mentioned under bullet numbers 3 and 4 on page C-14 of the ROD; it is up to the local forest to determine the retention levels that will result in a beneficial (for silvicultural activities) or neutral (for salvage activities) effect on LSRs.

7 Page 149, paragraph 6, last sentence. The Service strongly encourages the Monument's efforts on inventorying and monitoring cave and surface biota. Because many of the bat species inhabiting the caves are Federal Species of Concern, the Service supports management to their benefit. If seasonal cave closures are implemented, the Service encourages a statistically designed monitoring scheme to help assess whether or not closures were effective in reducing disturbance to bats and other biota at critical times of the year.

8 Page 184 - 187, Appendix C. The species list sent to the Monument in the Service's letter of March 21, 1996, is now out of date and the Service recommends that the Monument request a new species list.

Page 193, paragraph 5, sentence 1. The statement "Section 7 of the Endangered Species Act requires that when a project or proposal by a federal agency has the potential to impact a known endangered, threatened or candidate plant or animal species, that agency must enter into formal consultation with the U.S. Fish and Wildlife Service (USFW)" needs clarification. Consultation is not required for candidate species (or species of concern), although the Service recommends addressing potential impacts to these species in order to prevent future conflicts. Also, consultation is not only required on individual projects or developments, but also on management plans such as this one, if the agency determines that the plan's activities may effect federally listed species either positively or negatively. Reviewers of this DEIS could not find an overall determination effect of the Monument's Draft Management Plan on listed species. Finally, species that are proposed for listing are addressed through the conferencing process within the Endangered Species Act, if a proposal is determined by the action agency to jeopardize the continued existence of the proposed species.

16

9

Summary

The Service supports the return of fire into its natural role in the ecosystem however, we realize this is a complicated task, particularly given that past fire suppression has resulted in an existing vegetation condition that may not favorably respond to controlled burns without some treatment prior to burning. The Service is available to provide technical assistance for any of the Monument's decision documents with regard to conservation of fish and wildlife resources. The Draft Oregon Caves National Monument General Management Plan and DEIS is overall, thorough and well considered. The Service's suggestions are meant to strengthen this document and we thank you for this opportunity to provide input. Please feel free to contact Debra Kinsinger, of my staff, at (541) 957-3473 if you have any questions or need further technical assistance.

cc: Paul Henson, USFWS-OSO, Portland, OR

E:\DEBRI\NEA&EIS\OCNM.MMO

COMMENTS

L-54

ROBERT F. (BOB) SMITH
3rd District
Oregon

COMMITTEE ON AGRICULTURE
CHAIRMAN
COMMITTEE ON RESOURCES
SUBCOMMITTEE ON
NATIONAL PARKS AND PUBLIC LANDS
SUBCOMMITTEE ON WATER AND POWER

Congress of the United States

February 26, 1998

RECEIVED
MAR 04 1998
OREGON CAVES
NATIONAL MONUMENT

Mr. John Reynolds
Regional Director
National Park Service
600 Harrison St. Suite 600
San Francisco, CA 94101

Dear Mr. Reynolds:

I am writing in regard to the National Park Service's (NPS) preferred alternative C as outlined in the NPS Draft General Management Plan (GMP) for the Oregon Caves National Monument (Monument).

17

At this time, I am particularly concerned about the NPS's proposal to restrict Cave access and to transfer the responsibility for guiding Cave tours from the concessionaire to the NPS. It appears that this proposal could have a significant impact on the regional community, as well as transforming the guided tours from a revenue-raising component of the Monument into a drain on the taxpayers of the United States.

I am concerned that lowering the tour numbers and frequency will have a detrimental effect on the local community. Currently, the target maximum number of Cave visitors per day is 1,760. This will be reduced to a maximum in alternative C of 700 visitors per day. The NPS estimates that under the preferred alternative 5,500 fewer people will be able to tour the Cave annually. It would seem that this decrease in tourists will result in fewer visitors to the area, resulting in less economic activity in the local community.

I am also concerned about the additional burden that the preferred alternative will place on the American taxpayers through the hiring of additional NPS staff to conduct tours of the Cave. Most apparent is the immediate expenditure of approximately $2 million for employee housing that will be required, where none is provided today.

Additionally, the NPS is seeking $270,000 a year to operate the Monument, some of which will likely be needed for proposed NPS Cave tour operations. These appropriations from Congress would be required to replace a Cave tour program that is currently generating revenue for the United States and in which 92% of the visitors

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843 EAST MAIN, SUITE 400
MEDFORD, OR 97504-7137
(541) 776-4646
TOLL FREE: 800-533-3303

RESPONSES

Letter 2: Representative Robert F. Smith

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific West Regional Office
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

IN REPLY REFER TO:
A3615(PWRA)

March 18, 1998

Honorable Robert F. Smith
Member of Congress
1126 Longworth Building
Washington, DC 20515-3702

Dear Congressman Smith:

Thank you for commenting on the draft General Management Plan for Oregon Caves National Monument. The plan generated considerable interest from throughout the state of Oregon and several other states. Though comments are continuing to come in, over 500 responses had been received prior to the March 13 closure date for public comment. The overwhelming majority have demonstrated strong support for Alternative "C", the preferred alternative.

I want you to know that the National Park Service shares your concerns for maintaining efficient operations at the Monument and keeping it a vital part of the southern Oregon community. We believe that the preferred alternative would work toward those objectives by providing overall improved recreational opportunities and experiences for visitors. This would be accomplished by better scheduling and visitor management for cave tours and increased recreational opportunities for hiking, horseback riding and interpretive activities within the proposed expanded boundaries. Additionally, by adding a reservation center in the existing visitor information facility in Cave Junction, visitors will be able to better schedule their time in southern Oregon. Rather than rushing to the Monument to sign up for a tour on a first come, first served basis, visitors will be able to choose from available tour times and confirm a reservation in advance. Visitors would then be free to spend time exploring other amenities in the Illinois Valley such as museums, local craft shops, businesses, and wineries. Large crowds suffering long waits at the Monument would be reduced thereby lessening congestion throughout the site and reducing visitor frustration. We hope that visitors may even extend their visit by staying overnight in local lodging or one of the nearby U.S. Forest Service or state park campgrounds. The extra time in the area would allow them to use new recreational trails or take advantage of expanded interpretive activities at the Monument. This concept fits well with the strategic plan developed for the Illinois Valley Community Response Team and

COMMENTS

Mr. John Reynolds
February 26, 1998
Page 2

surveyed by the NPS stated that they would rate the quality of their tour guide presentation as "acceptable" to "very acceptable." Not a single visitor found the quality of the tour guide presentation to be "somewhat unacceptable" or "totally unacceptable."

Finally, I am concerned about the impact to Josephine County from lost tax revenue on the buildings. Under alternative C, the concessionaire would no longer possess the Monument's structures, which would result in the loss of a substantial amount of tax revenue which equaled approximately $44,000 for the years 1993 to 1997.

I appreciate your taking my concerns into consideration as you make your decision regarding the management of the Monument. The NPS has become a partner with the Illinois Valley Community and it would be unfortunate if this major economic partner undertakes an action that has an adverse effect on the region. 18

Sincerely,

Robert F. (Bob) Smith
Member of Congress

cc: Mr. Craig Ackerman, Superintendent, Oregon Caves National Monument

RFS/ljs

RESPONSES

Tourism Committee. That plan, authored by Michael Wetter and Associates of Portland, identifies the Monument as one of the anchor properties for the Illinois Valley. It further states that a prime objective for the community should be to develop plans that would increase the likelihood of visitors extending their stay. Current visitors to the Monument stay an average of only a few hours before moving on to other destinations outside of the local area - often along the coast or in California.

Nowhere in the plan does the National Park Service estimate a loss of 5,500 visitors annually. Using 1996 tour data, even a strict overlay of the 700 person daily carrying capacity would result in only about 850 fewer admissions over the year. However, we feel that better scheduling and increased recreational options would not result in a reduction but rather an overall increase in Monument visitation.

The current limit of 1760 persons per day is based on a previous concession contract which permitted tours of 16 persons every six minutes from 8:00 a.m. to 7:00 p.m. during peak season. These numbers were based on parking lot capacities identified in a 1975 master plan. The limit did not consider resource protection or visitor experience. The limit is not realistic and such visitation numbers have never been approached. The proposed daily capacity of 700 has been determined by resource management and interpretive specialists to be a reasonable number based on size of passageways and rooms, ability of guides to see visitors and reduce vandalism, and for reduction of crowding and improving of visitor experiences during peak periods. The 1995 Oregon State University (OSU) visitor survey provided that most visitors experienced a degree of perceived crowding on tours and would like a smaller group size with fewer encounters with other tour groups.

The National Park Service also shares your concerns on holding down the cost of providing employee housing. The proposed housing would provide additional personnel on site that could respond to emergency medical situations, participate in search and rescue efforts (both in the cave and on the surface), and provide protection of the Monument's resources and visitors. We presently have very limited response capabilities in those functional areas since we have no employees housed on site. This need would be met by retrofitting an existing historic structure rather than construction of a new facility. Since the lower level of the structure is planned to serve as the visitor center , some retrofitting costs would be shared between the two projects. I assure you that any plan for remodeling this facility will undergo critical review to insure cost efficiency before it is submitted to Congress for approval of funding.

If the preferred alternative is implemented, there should be no additional burden on the taxpayers to conduct cave tours. No appropriated funds are being requested to operate tours. Revenues generated from tour fees would exceed the costs of providing the tours, in effect returning additional funds to the government. Nearly 84% of visitors in the OSU survey identified as their preference the return of cave tours fees to the Monument for maintenance and operations. The increased funding identified in the plan is for operation of the visitor center, increased resource management and research, maintenance and wildland fire protection. It should be noted that development of an on site visitors' center was also identified as an important need by visitors in the 1995 OSU study.

There would be a slight reduction in payment of property taxes by the Monument's concessionaire. An appraisal completed in 1997 indicated that the present concessionaire paid approximately $4450 in taxes on structures and $1400 on the cave in that year. The matter of payment of taxes on the cave itself has been appealed by the concessionaire on the basis that the county cannot tax federally owned property. The $4450 assessment represents the value of controlling use of the buildings at the site. A concessionaire would retain controlling use of the Chateau and Guide House buildings under the preferred alternative. Since this represents the majority of the value on which county taxes are paid, the reduction in payments would be minor. We believe that increased tourism opportunities and resultant financial benefits to the county represented by the plan would more than offset the minor reductions in property tax payments.

It is incumbent upon us to devise a plan that provides for protection of the Monument's resources while providing the best possible experience for the public. We also understand that the National Park Service is an important partner in maintaining a viable tourism industry in the Illinois Valley and southwestern Oregon. Our continued partnership with the City of Cave Junction, Josephine County, the Illinois Valley Chamber of Commerce and other federal agencies at our Cave Junction visitors' center site demonstrates our commitment to that concept. We think this plan is a major step in accomplishing both of those objectives.

Sincerely,

/S/ JOHN J. REYNOLDS

John J. Reynolds
Regional Director, Pacific West Region

COMMENTS

United States Department of Agriculture | Forest Service | Siskiyou National Forest | 200 NE Greenfield Road PO Box 440 Grants Pass, OR 97526-0242

Reply To: 1920 Planning

Date: March 12, 1998

Mr. Craig Ackerman
Superintendent
Oregon Caves National Monument
Cave Junction, Oregon

RECEIVED
MAR 14 1998
OREGON CAVES NATIONAL MONUMENT

Dear Mr. Ackerman,

This letter is a response to the Oregon Caves National Monument Draft General Management Plan and Environmental Impact Statement. Our intent is to assist you in the successful completion of your planning process, with a common goal of a high quality and credible environmental document. We very much appreciated the willingness of you and your associates to meet with us in Portland to discuss our thoughts, and believe that was a very productive meeting in helping resolve some of our concerns. As agreed, we will provide two or more of our specialists to work with you on the detailed concerns we discussed on the earlier conference call.

20

As we discussed in Portland, our major concern was the apparent disregard or inappropriate speculation about the Siskiyou National Forest Land and Resource Management Plan, as amended by the President's NW Forest Plan. The Forest Ecosystem Management Assessment Team provided the scientific background and analysis for the Northwest Forest Plan. This interagency group included scientists from universities, research community, the Fish and Wildlife Service, the Forest Service, National Park Service, and the Bureau of Land Management. It represents the very best ecosystem management science and analysis.

1

Your analysis seemed to assume this plan is not in place and assumed thatmanagement direction preexisting the Northwest Forest Plan prevails. An example is the chart on page 63. Under Alternative A, where the Northwest Forest Plan provides direction for the watershed, your analysis has a blank for protection of Cave/Lake Creek Watershed and a blank for the protection of Monument's public water supply. Alternatives B, C, and D provide protection for these two items. In chapter five, the effects of implementation speak to clearcuts, increased fragmentation, prevention of road decommissioning, etc. in Late-Successional Reserves. These are all counter to the management direction for LSR's.

Chief Mike Dombeck recently released the Natural Resource Agenda for the Forest Service, and we would hope that any speculation about what might replace the current Forest Plan would consider the importance and direction of that agenda. While it is true that our planning process is dynamic and subject to change over time, it is simply argumentative to speculate that future management might look anything like past management. That is clearly not the trend.

RESPONSES

Letter 3: Superintendent Siskiyou National Forest

1. In coordination with Siskiyou National Forest staff, changes have been made throughout the document to better reflect how the *Northwest Forest Plan* relates various issues to the proposal.

2. Corrections and clarifications have been made throughout the document to acknowledge any substantiated errors in factual information cited by Siskiyou National Forest subject matter experts.

3. When conducting comprehensive general management planning for unit of the National Park System, it is common practice for NPS staff to consider a wide range of professional and other published material that is available on various resource issues for consideration as to our future management of park resources. These materials may include, but are not limited to, scientific and professional journals, PH.D. dissertations, government reports and other sources. As evidenced by the extensive bibliography included with the draft GMP/EIS, we intentionally did not limit our review of available literature to that provided by public agencies. However, we do strive for accuracy in use of data to support various conclusions and findings. As discussed in meetings with USFS local and regional staff, references for some resource issues were included to place the document and issues within current "sociological" context. Factual errors in the references have been corrected or deleted in coordination with SNF staff. However, to delete all references to disagreements with public agency policy would subject the document to criticism for failing to adequately address all issues of public concern that affect existing or future management of the Monument.

4. The implication that management of National Park System areas is "locked in" is incorrect. National parks, like national forests are managed using the best available scientific and sociological information available. Management decisions may be changed over time to reflect new, more accurate information or to recognize new and more efficient methods to protect and preserve resources. The mandate that areas under NPS administration be managed to "... conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations" is "locked in." We recognize that the mission of the USFS does not necessarily coincide, nor should it, with that specific mandate. The

Typical Document Problems

Throughout the document many far-reaching speculative statements are relied upon as facts. For example, on page 68, "A decline in precipitation during the last 20 years roughly correlates with the intensity of regional timber harvesting and may result from changes in albedo and convective storms." There may be some scientists who believe that; others clearly would dispute it. Whether true or not, however, the addition of even 3300 acres to the Caves Monument seems irrelevant to the notion. This type discussion leads to such speculative conclusions as on page 134 that "timber harvesting could lead to degraded water quality of the cave ecosystem." The Forest Service fully recognizes the national significance of the Oregon Caves; such activities would be prevented by our allocations and common sense.

On page 5, "The native vegetation and fauna may become increasingly significant for scientific studies as the surrounding national forest land is logged for timber or utilized in other ways under multiple use management." This statement does not acknowledge the existing system of Research Natural Areas across all plant series. Neither does it recognize the ecosytem-based objectives of the Late-Successional Reserves and other allocations which completely surround the Caves, nor the Aquatic Conservation Strategy of the 1994 Northwest Forest Plan.

2

In addition to not acknowledging existing land allocation requirements, the influence of other existing law is also down-played. The statement on page 9, "Such activity (harvest activity) could negatively impact owls which nest within the Monument and other plant and animal species" does not consider the body of requirements under the Endangered Species Act. The Forest Service manages National Forest lands surrounding the Park (and all other National Forests) in accordance with the Endangered Species Act; consultation is required with the U. S. Fish and Wildlife Service. The controlling Standard and Guidelines for these lands on this subject are found on page C-11 through C-21 of the 1994 Northwest Forest Plan. This scientific document requires that the Late Successional Reserves are to be managed to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat of the Northern Spotted Owl. This is contrary to the statement in the DEIS.

3

Many of your references for the resources issues are from non-peer reviewed literature authored by advocacy groups. They consist of publications and editorials that contain information designed to influence opinions in furtherance of their own agendas and, in some cases, cite incorrect or unsupported information. As an example, you cite the allowable sale quantity for the Siskiyou National Forest as being 27 million feet (page 103) with your source being a local activist, Romain Cooper. The allowable sale quantity is actually 24 million feet, as documented in many Forest Service publications. The opinions of advocacy groups are often sources of substantive comment; however, they seldom represent the best source of information about Forest Service plans and programs. They also seldom represent peer-reviewed science, which is available to your authors from many credible sources.

legislative intent of Congress is clear: national park areas represent the finest examples of the natural and cultural heritage of our nation. They are to be held to the highest standard of protection, in perpetuity, so that their values will not be diminished - even in response to dynamic, changing, short term societal needs. It was this forward thinking that created a National Park System unequaled and envied throughout the world.

4 As we discussed in Portland, we have no position on the DEIS preferred alternative. Our expectation is that many of the differences in future management as projected in your DEIS will be minimized once the effects of the Siskiyou Forest Plan are correctly assessed. We acknowledge that one major difference is that your management is "locked in" unless changed by legislation, and generally not subject to change over time. The National Forest Management Act directs that our plans be dynamic, changing over time in response to new information and societal needs. Which of those approaches is "best" for this particular area of National Forest is probably in the eyes of the beholder.

Thank you for the opportunity to comment.

J. MICHAEL LUNN
Forest Supervisor
Siskiyou National Forest

cc:R6 RO

COMMENTS

MAR-17-98 TUE 01:40 PM CRATER LAKE LODGE 1 541 830 8514 P.01

03/17/98 13:37 ☎541 8088104 SEN SMITH WFD 002

MAR.17.1998 1:00PM

TO:MEDFORD

GORDON H. SMITH

NO.552 P.1/1

L-570

United States Senate

WASHINGTON, DC 20510-3704

March 13, 1998

541 830-8514

Mr. John Reynolds
Regional Director
National Park Service
600 Harrison St., Suite 600
San Francisco, CA 94101

RECEIVED
MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

August 26

Dear Mr. Reynolds:

I am writing regarding the National Park Service's "proposed preferred alternative C" as outlined in the Draft General Management Plan for the Oregon Caves National Monument.

The preferred alternative concerns me for several reasons. This proposal suggests transferring from the private sector to the federal government the responsibility for guiding tours. I have not seen any evidence to show a need to change service providers. As a matter of fact, the current guides with the Oregon Caves Company have had a history of excellence. The federal government should not be in the business of a guide service when a private organization has provided reliable, efficient service.

Other concerns I have include:

- Tour group numbers decreased from 1760 to 700 visitors a day, resulting in an estimated annual loss of $90,000 to the Caves National Monument and $450,000 to the Southern Oregon area
- Operations costs for the Monument increased by an additional $270,000 annually
- The negative financial impact to Josephine County from lost tax revenue was estimated to be $44,000 a year on buildings currently possessed by the concessionaire
- Hiring additional Park Service staff to conduct tours would result in a $2 million housing expenditure

Instead of increasing the red tape and levels of bureaucracy through which our local communities must dig in order to enjoy and enhance our natural resources, energies should be spent on how to reduce the bloated bureaucracy of federal government. I appreciate your taking my concerns into consideration as you make your decision regarding the management of the Caves National Monument.

Warm regards,

Gordon H. Smith
United States Senate

GHS:jd

RESPONSES

Letter 4: U.S. Senator Gordon H. Smith

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific West Regional Office
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

IN REPLY REFER TO:
A3615(PWRA)

August 10, 1998

Honorable Gordon H. Smith
United States Senate
B40 #2 Dirksen Office Building
Washington, DC 20510-3704

Dear Senator Smith:

Thank you for commenting on the draft General Management Plan for Oregon Caves National Monument. The plan generated considerable interest from throughout the state of Oregon and several other states. Though comments are continuing to come in, over 700 responses had been received to date. The overwhelming majority have demonstrated strong support for Alternative "C" the preferred alternative.

I want you to know that the National Park Service shares your concerns for maintaining efficient operations at the Monument and keeping it a vital part of the southern Oregon community. We believe that the preferred alternative would work toward those objectives by providing overall improved recreational opportunities and experiences for visitors. This would be accomplished by better scheduling and visitor management for cave tours and increased recreational opportunities for hiking, horseback riding and interpretive activities within the proposed expanded boundaries. Additionally, by adding a reservation center in the existing visitor information facility in Cave Junction, visitors will be able to better schedule their time in southern Oregon. Rather than rushing to the Monument to sign up for a tour on a first come, first served basis, visitors will be able to choose from available tour times and confirm a reservation in advance. Visitors would then be free to spend time exploring other amenities in the Illinois Valley such as museums, local craft shops, businesses, and wineries. Large crowds suffering long waits at the Monument would be reduced thereby lessening congestion throughout the site and reducing visitor frustration. We hope that visitors may even extend their visit by staying overnight in local lodging or one of the nearby U.S. Forest Service or state park campgrounds. The extra time in the area would allow them to use new recreational trails or take advantage of expanded interpretive activities at the Monument. This concept fits well with the strategic plan developed for the Illinois Valley Community Response Team and Tourism Committee. That plan, authored by Michael Wetter and Associates of Portland, identifies the Monument as one of the anchor properties for the Illinois Valley. It further states that a prime objective for the community should be to develop plans that would increase the likelihood of visitors extending their stay. Current visitors to the Monument stay an average

of only a few hours before moving on to other destinations outside of the local area - often along the coast or in California.

Providing a quality interpretive experience while protecting the Monument's resources is paramount for the National Park Service. These responsibilities have been presented to us by the American people through Congress. We are proud of our ranger interpreters. They have earned a reputation as the finest practitioners in their field throughout the United States and the world. NPS interpreters have taught and written textbooks used in training interpreters in numerous colleges and universities around the country. Other countries seeking to develop or improve national park systems have sought out our personnel as consultants or subject matter experts in order that their programs might duplicate the success and quality of ours. Many of our interpreters have special training or advanced degrees in environmental education, natural and cultural history or specific fields that relate to park resources. Our seasonal staffs also posses strong backgrounds in these areas. The public expects quality interpretive experiences provided by National Park ranger staff when visiting their parks and monuments. Our preferred alternative draws on the strengths and abilities of the National Park Service to deliver interpretive programs at the high quality and by the methods that meet those expectations.

The history of concession led interpretation has been inconsistent. During the two scheduled periodic evaluations in 1997, concession interpretive services received ratings of three (satisfactory) and two (marginal) on a rating scale of one to five. In 1996 the average audit score for concessions guides was 79.7 while a passing score was 80. Previous concession guides, including one of the most respected head guides have commented in writing that the public and resources would be best served b NPS led interpretive tours.

The current limit of 1760 persons per day is based on a previous concession contract which permitted tours of 16 persons every six minutes from 8:00 a.m. to 7:00 p.m. during peak season. These numbers were based on parking lot capacities identified in a 1975 master plan. The limit did not consider resource protection or visitor experience. The limit is not realistic and such visitation numbers have never actually occurred. In fact, even during the busiest days, cave visitation almost never exceeds 50% of that amount. The proposed daily capacity of 700 has been determined by resource management and interpretive specialists to be a reasonable number based on size of passageways and rooms, ability of guides to see visitors and reduce vandalism, and for reduction of crowding and improving of visitor experiences during peak periods. The 1995 Oregon State University (OSU) visitor survey provided that most visitors experienced a degree of perceived crowding on tours and would like a smaller group size with fewer encounters with other tour groups.

The plan will not result in an annual loss of $90,000 in revenues to the monument. Currently no portion of the revenues from cave tours are retained by the Monument. Of an estimated $360,000 in cave tour admission fees in 1997, $352,800 would be retained by the concessionaire and $7,200 would be returned to the government in the form of franchise fees. The franchise fees are not returned to the monument for support of maintenance or operations; but, instead, are deposited in the general fund of the U.S. Treasury in Washington, D.C. We further believe the loss of $450,000 annually in tourism revenues to the southern Oregon area is highly speculative and not supportable by any elements of the plan.

If the preferred alternative is implemented, there should be no additional burden on the taxpayers to conduct cave tours. No appropriated funds are being requested to operate tours. Revenues generated from tour fees would exceed the costs of providing the tours, in effect returning additional funds to the government. Nearly 84% of visitors in the OSU survey identified as their preference the return of cave tours fees to the Monument for maintenance and operations. The $270,000 in funding identified in the plan is for operation of the visitor center, increased resource management and research, maintenance and wildland fire protection. It should be noted that development of an on site visitors' center was also identified as an important need by visitors in the 1995 OSU study.

The loss of tax revenues to Josephine County would not be $44,000 a year. There would be a slight reduction in payment of property taxes by the Monument's concessionaire. An appraisal completed in 1997 indicated that the present concessionaire paid approximately $4450 in taxes on structures and $1400 on the cave in that year. The matter of payment of taxes on the cave itself has been appealed by the concessionaire on the basis that the county cannot tax federally owned property. The $4450 assessment represents the value of controlling use of the building at the site. A concessionaire would retain controlling use of the Chateau and Oulde House buildings under the preferred alternative. Since this represents the majority of the value on which county taxes are paid, the reduction in payments would be minor. We believe that increased tourism opportunities and resultant financial benefits to the county represented by the plan would more than offset the minor reductions in property tax payments.

The National Park Service also shares your concerns on holding down the cost of providing employee housing. The proposed housing would provide additional personnel on site that could respond to emergency medical situations, participate in search and rescue efforts (both in the cave and on the surface), and provide protection of the Monument's resources and visitors. We presently have very limited response capabilities in those functional areas since we have no employees housed on site. This need would be met by retrofitting an existing historic structure rather than construction of a new facility. Since the lower level of the structure is planned to serve as the visitor center, some retrofitting costs would be shared between the two projects. I assure you that any plan for remodeling this facility will undergo critical review to insure cost efficiency before it is submitted to Congress for approval of funding.

It is incumbent upon us to devise a plan that provides for protection of the Monument's resources while providing the best possible experience for the public. We also understand that the National Park Service is an important partner in maintaining a viable tourism industry in the Illinois Valley and southwestern Oregon. Our continued partnership with the City of Cave Junction, Josephine County, the Illinois Valley Chamber of Commerce and other federal agencies at our Cave Junction visitors' center site demonstrates our commitment to that concept. We think this plan is a major step in accomplishing both of those objectives.

Sincerely,

/S/ JOHN J. REYNOLDS

John J. Reynolds
Regional Director

COMMENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

JAN 30 1998

RECEIVED
FEB 2 1998
OREGON CAVES
NATIONAL MONUMENT

Reply To
Attn Of: ECO-088

Craig W. Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Re: Oregon Caves National Monument General Management Plan
Draft Environmental Impact Statement

Dear Mr. Hendricks:

The U.S. Environmental Protection Agency (EPA) has received the Oregon Caves National Monument General Management Plan Draft Environmental Impact Statement (EIS) for review in accordance with our responsibilities under the National Environmental Policy Act and under Section 309 of the Clean Air Act.

EPA Region 10 has used a screening tool to conduct a limited review of the draft EIS. Based upon the screen, we do not foresee having any major environmental objections to the proposed project. Therefore, we will not be conducting a detailed review of the draft EIS.

If you have any questions, please contact me in Seattle at 206/553-8574.

Sincerely,

Richard B. Parkin

Richard B. Parkin, Manager
Geographic Implementation Unit

Printed on Recycled Paper

26

RESPONSES

Letter 5: Environmental Protection Agency

Thank you for your comments.

COMMENTS

MAR-13-98 10:25 FROM: JOSEPHINE COUNTY ID: 541 474 5106 PAGE 2

L-445

JOSEPHINE COUNTY OREGON

COURTHOUSE GRANTS PASS, OREGON 97526
FAX (541) 474-5105 Voice (541) 474-5221 TDD 1-800-735-2900
http://www.magick.net/jocogov

BOARD OF COMMISSIONERS
Fred Bongiasset
Jim Brock
Harold L. Haugen

March 11, 1998

RECEIVED
MAR 13 1998
OREGON CAVES NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97503

Dear Mr. Ackerman:

Thank for the opportunity to comment on the National Park Service Draft General Management Plan (GMP) for the Oregon Caves National Monument. Obviously a tremendous amount of work and effort went into developing the GMP and the alternatives.

We have two concerns with the preferred alternative "C" if it is adopted.

27

The concessionaire at the monument is a vital and stable Josephine County business. We do not see a need to switch to National Park Service employees as tour guides nor the additional cost for housing them. The concessionaire is supportive of the community, a major contributor of money and effort to bring tourists dollars to our area, and a property and income tax payor who buys locally and gives preferential hiring to local residents.

Our other concern is the transfer of 3,310 acres from Siskiyou National Forest to the National Park Service. We agree the water system needs protection and recommend a lease or an arrangement with Siskiyou National Forest to meet that need. We believe those acres should continue to be managed as an LSR.

Thank you again for the opportunity to comment.

Sincerely,

JOSEPHINE COUNTY BOARD OF COMMISSIONERS

ABSENT
Jim Brock, Chair

Harold Haugen, Vice Chair

Fred Bongiasset, Commissioner

BBC\amh

Josephine County is an affirmative action/equal opportunity employer and complies with section 504 of the rehabilitation act of 1973.

RESPONSES

Letter 6: Josephine County Board of Commissioners

Thank you for your comments. Please see NPS response to Letters 15, 16, 17 and 18 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

L-528

BRADY ADAMS

President of the Senate

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

March 10, 1998

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Mr. Ackerman:

I understand the National Parks Service is proposing a General Management Plan for the Oregon Caves National Monument that includes, among other changes, a transfer of responsibility for the cave tours from a private business to the NPS.

At a time when the United States Congress as well as state legislative bodies all across the country are considering privatizing services now provided by government, I am having difficulty understanding the logic of the NPS proposal. Can you help by providing me with the NPS's reasons for such a proposal? Until I become convinced otherwise, I am firmly on the side of those who are resisting the proposed changes, and I encourage you to reconsider such a proposal.

I would appreciate hearing from you. You can reach me in Salem at (503) 986-1600, or you may wish to call Gary Wilhelms on my staff at (503) 986-1529.

Sincerely,

Brady Adams

S-203 State Capitol, Salem, Oregon 97310-1347
(503) 986-1600

28

Letter 7: State Senator Brady Adams, President of Oregon State Senate

Thank you for your comments. Please see NPS responses to Letters 15, 16, 17, and 18 from Estey Corporation.

L-444

OREGON TOURISM
COMMISSION
775 Summer Street, NE Salem, Oregon 97310
Tel: 503.986.0000
Fax: 503.986.0001 TTY: 503.986.0123
www.traveloregon.com

March 10, 1998

RECEIVED
MAR 19 1998
OREGON CAVES
NATIONAL MONUMENT

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Mr. Ackerman:

As chairman of the Oregon Tourism Commission I am deeply interested in the quality of visitor services and attractions in our state. Tourism in Oregon has grown to become a $4.7 billion industry and in order to distinguish Oregon from the competition we must achieve the highest levels of value and quality in the services, amenities, and products we provide our visitors. For this reason, I am replying to the call for written responses regarding proposals contained within the Draft General Management Plan for the Oregon Caves National Monument.

The Preferred Alternative C appears to call for a reduction in the number of individual cave tours and the implementation of a reservation system. This could lead to waits for available tours and some visitors choosing to continue on rather than wait for the next available tour. Both instances would lead to dissatisfaction with the visitor's Oregon experience. I would ask that these actions be implemented only if it is deemed necessary in order to protect the primary resource for future visitation and provide current visitors with the optimal experience.

I also noted under the preferred alternative, that the concessionaire will continue to provide lodging, restaurant, and retail services to visitors. The cave tours would be provided by National Park Service employees. Yet, the cave tours appear to be the most profitable portion of the concessionaire's operation and the concessionaire, in turn, uses a portion of these funds to market the Oregon Caves and the southern Oregon region. I understand that there may be some economy of scale to the National Park Service to utilize their employees as guides, in addition to a variety of other emergency and visitor services. But, given that federal agencies are precluded from "advertising", I am concerned that the loss of profitability to the concessionaire will limit marketing funds available to the Oregon Caves and the region. Visitation to the park and the region may suffer as a result. Please take this into consideration when deciding on the final alternative and in negotiating future franchise fees and contracts with the concessionaire.

I applaud the call for continued and enhanced partnerships with the tourism industry in the region, for expansions of the Illinois Valley Visitors Center, the provision of tourism and recreation information on the Internet, and the evaluation of the visitor center's focus to ensure the promotion of tourism and recreation in the region. In these times of limited funds, interagency and private/public partnerships are crucial to Oregon's success as a quality visitor destination.

Governor John A. Kitzhaber

The commission is an AA/EEO employer, in compliance with Section 504 of the Rehab. Act of 1973

29

Letter 8: Letter Oregon Tourism Commission

Thank you for your comments. Please see NPS responses to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

COMMENTS

RESPONSES

I appreciate this opportunity to respond to the Draft General Management Plan for the Oregon Caves National Monument. Please contact me or the Commission's director, Todd Davidson, with any questions you may have.

Sincerely,

Gerry Frank
Chairman

L-533

Oregon

PARKS AND RECREATION DEPARTMENT

STATE HISTORIC PRESERVATION OFFICE

March 12, 1998

RECEIVED
MAR 15 1998
OREGON CAVES NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

RE: Draft Oregon Caves National Monument General Management Plan and Environmental Impact Statement
Oregon Caves National Monument, Josephine County, Oregon

Dear Mr. Ackerman:

Thank you for your submission of the *Draft Oregon Caves National Monument General Management Plan and Environmental Impact Statement*. This information was submitted in compliance with the National Historic Preservation Act of 1966 (16 U.S.C. 470f), Section 106, and reviewed under criteria and procedures outlined in 36 CFR Part 800. Further consultation and comment was also solicited from appropriate SHPO program staff.

I would like to extend my thanks to your staff, particularly John Roth, for his hospitality on March 9, 1998 when I visited Oregon Caves National Monument. The site visit provided a much better understanding of the context within which management issues are discussed, and how the Draft Plan and proposed alternatives would affect historic resources in the area. Within the boundaries of the Monument is the Oregon Caves Historic District, which includes wonderful examples of buildings designed and constructed in the Rustic tradition, located in a beautiful natural setting. Features within the district are identified as the Checking and Comfort Station, the Guide Dormitory, the Chateau, the Chalet, and the Ranger Residence, as well as Circulation features (roadway, parking areas, walkways and trail system), and small scale structural features (pools, rockwork, benches and lighting standards).

We support the efforts of NPS Monument staff to improve and maintain this important site for use and enjoyment by the public. The preferred alternative, Alternative C, suggests that NPS would acquire the existing possessory interest in all the Monument buildings. This acquisition would likely result in slight changes to interior spaces in the Chalet and Chateau buildings, for use by NPS staff. The lower level of the Chalet would be used as an on-iste visitor center, and the upper level would be used for apartments for staff.

As described by Mr. Roth on site and in the Draft Plan, these changes would be acceptable if carried out in a way that does not alter the significant historic features of the District. Interior changes to the buildings should respect the basic interior configuration, retain historic fabric such as windows, window surrounds, and siding, and should not be evident from the exterior.

1115 Commercial St. NE
Salem, OR 97310-1001
(503) 378-5001
FAX (503) 378-6447
7/4/98-RF

Letter 9: Letter Oregon State Historic Preservation Offices

COP

United States Department of the Interior
NATIONAL PARK SERVICE

IN REPLY REFER TO:

Crater Lake National Park
Post Office Box 7
Crater Lake, Oregon 97604

Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

H4217(ORCA)

June 10, 1998

Mr. Robert L. Meinen
Director
Oregon Parks and Recreation Department
1115 Commercial Street NE
Salem, Oregon 97310-1001

Dear Mr. Meinen:

Thank you for your comments (March 12, 1998) on the Draft Oregon Caves National Monument General Management Plan and Environmental Impact Statement. The comments have been taken into consideration, and your letter will be reprinted in the final, published plan to show consultation with your office took place during this planning process. We appreciate you taking the time to review the draft document that will guide park management for at least the next 15 years.

Your specific comment about developing an agreement between your office and the park would facilitate compliance for the annual and ongoing preservation maintenance work that occurs in the historic district on both the buildings and landscape. We look forward to working with you and your staff on this effective, cost and time saving proposal after the general management planning effort is concluded.

Sincerely,

Craig W. Ackerman
Superintendent
Oregon Caves National Monument

cc: CCSO-RE, Dunbar

COMMENTS

RESPONSES

Prior to implementation, projects should be submitted to the SHPO for review under Section 106. Alternatively, a Programmatic Agreement could be developed which would allow certain identified ongoing activities and maintenance to proceed without further SHPO review.

My appreciation again to Mr. Roth for his very enjoyable tour of the buildings and the caves. If you should have any questions, or need additional assistance, please feel free to contact me at the SHPO, extension 229.

Sincerely,

Liz Carter
Preservation Specialist

32

L-63

Grants Pass and Josephine County
CHAMBER OF COMMERCE

E-MAIL: gpcoc@chsdlink.com
WEB: www.grantspass.com/chamber

RECEIVED
MAR 06 1998
OREGON CAVES
NATIONAL MONUMENT

February 26, 1998

Craig Ackerman
Oregon Caves National Monument
19000 Caves Hwy.
Cave Junction, OR 97523

Dear Mr. Ackerman:

The Grants Pass/Josephine County Chamber of Commerce Board of Directors has voted unanimously to support the Oregon Caves Company and the private concession arrangement that has existed over the last 20 years.

Over 25,000 visitors pass through our Grants Pass Visitor's Center each year with many of them headed for the Oregon Caves. We have not received a single complaint since the concession has been in existence. In fact, the Oregon Caves Company vigorously promotes tourism in our region, spending more than $50,000 each year on advertising, donating to non-profit organizations and partnering in local youth activities.

The Oregon Caves is very important to our local economy. It provides jobs, pays local taxes, supports our community, and brings in thousands of visitors each year. We do not believe a government agency would be as efficient or as fiscally responsible as a private concession, thus being a poor use of taxpayer dollars.

Thank you for your attention to our concerns.

Sincerely,

Rene' M. Pare'
President

RMP:ee

cc: United States Representative Robert F. Smith
State Representative Carl Wilson
Josephine County Board of Commissioners
Oregon Caves Company

P.O. BOX 970 • PHONE (541) 476-7717 • FAX: (541) 476-9574 • GRANTS PASS, OREGON 97528

Letter 10: Grants Pass/Josephine County Chamber of Commerce

Thank you for your comments. Please see NPS responses to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

COMMENTS

L-40

Mayor Gordon S. Anderson
101 N.W. A Street
Grants Pass, OR 97526
541-474-6360

RECEIVED
FEB 26 1998
OREGON CAVES
NATIONAL MONUMENT

February 23, 1998

Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Sir:

It is my understanding that a change is being considered for the management of the Oregon Caves National Monument. I am writing to discourage such a move.

By the National Park Service's own rating system, the Oregon Caves Company has done an excellent job of running the concession. As the saying goes, "If it ain't broke, don't fix it". A Company that has done such a good job should be given the chance to continue until such time that they fail to meet the standards.

The Federal Government pays no property tax to Josephine County, but a private operator does. We do not need more of a "taking" by government agencies than we already suffer. There may be other richer counties across America that can afford to give away taxes, but we cannot.

The United States Government will lose substantial franchise fees if the private operator is dismissed. Over $300,000 have been paid to the government since 1994 by the concessionaire. That's a terrific deal for the taxpayer. Why change when you're ahead.

Government has generally done a poor job of making a profit and with a proposed capital expenditure of $2,000,000 for new accommodations, it seems very unlikely that the operation will be profitable. Better to let local, private industry contract for the scheduling and tour interpretation concessions. The last thing this country needs is more beaurocrary.

I urge you to reject the idea of a government takeover of a private concession that is doing a good job. Leave the Cave's tour interpretation and the scheduling of the tours in the hands of the private concession.

Sincerely,

Gordon S. Anderson D.D.S., M.S.D.
Mayor, City of Grants Pass, Oregon

Cc: Senator Ron Wyden
Senator Gordon Smith
Representative Bob Smith
Representative Peter DeFazio

34

RESPONSES

Letter 11: Mayor, City of Grants Pass

Thank you for your comments. Please see NPS responses to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation..

COMMENTS

MAR 1 3 1998

City of Grants Pass

101 Northwest A Street
Grants Pass, Oregon 97526
(541) 474-6360

March 13, 1998

Superintendent
Oregon Caves National Monument
19000 Caves Hwy.
Cave Junction, OR 97523

Dear Superintendent Ackerman:

I would at this time like to support the retention of the Oregon Caves Company as concessionaire at the Oregon Caves National Monument and retain NPS/contractor relationships and operations as they currently exist. I recognize the NPS has concerns on a national basis, specifically with preserving valuable natural resources and national treasures. However, I think blanket policy should not be used to upset the critical economic balance we are currently enjoying with regard to the operation of the Oregon Caves.

35 1

I do not believe the preservation of this natural resource or the quality of the attraction to the visitor would be improved if operational activities were to change. In fact, I can see no real need to shift from the current operational status. Furthermore, I recognize the positive economic impacts felt in Grants Pass through the current operation. The Oregon Caves Company is a valuable resource and a key player in the City's tourism program, as it is with the Southern Oregon Visitors Association, of which I am a board member. The loss of this key player from local and regional tourism programs would be noticed.

Thank you for your time, and in closing I wish to reiterate the proposal to rethink your general management plan, look at what works here now and not base change on circumstances elsewhere.

Sincerely,

Charlie M. Mitchell
Economic Development Specialist
City of Grants Pass

RESPONSES

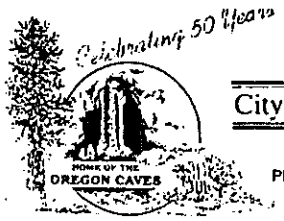
Letter 12: City of Grants Pass

1. Economic factors were considered in development of the proposal. The proposal does not recommend the discontinuation of concession services at the Monument. A new prospectus will be developed for a concession contract to provide food service, lodging, and gift and merchandise sales. In accordance with public law and policy, that prospectus must present a business opportunity that offers a reasonable opportunity for profit. NPS concession finance analysts have determined that the proposal will offer that opportunity.

   The Oregon Caves Company will have the chance to respond to the contract prospectus. In fact, that company has a preferential right of renewal for the new contract. Should the company be non-responsive to the prospectus, other offers will be considered. There is no reason to assume that the Oregon Caves Company, or another proprietor who successfully bids on the contract would not continue a mutually beneficial relationship with the Southern Oregon Visitors Association.

   Also see NPS responses to Letters 15, 16, 17 and 18 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

COMMENTS



City of Cave Junction • Home of the Oregon Caves

P.O Box 1396 • 222 Lister Street • Cave Junction, OR 97523
Phone (541) 592-2156 • Fax (541) 592-6694 • TDD Relay 1-800-735-2900
e-mail. cityofcj@cdsnet.net

March 5, 1998

US Department of the Interior
National Park Service
Attn: Craig Ackerman
19000 Caves Hwy
Cave Junction OR 97523

RECEIVED
MAR 0 9 1998
OREGON CAVES
NATIONAL MONUMENT

SUBJECT: Rumored Plan of Closure

The City of Cave Junction received a complaint that the National Park Service plans to close the Oregon Caves for tours three to four months each year. It was an unanimous decision of the City Council to oppose this plan.

The economic development strategy of the Illinois Valley is tourism. The Oregon Caves is the largest attraction to bring tourists into the valley. If the Caves are closed for 3 to 4 month each year, the impact would be felt by the entire valley and the businesses in Cave Junction in particular.

As the hub of commercial activity within the valley, if the businesses in the City lose the tourist trade of visitors from the Caves for a four month period each year, it could cause an economic loss that would lead to closures. This would create an impact on the economic community/ enterprise zone designation the valley received from the federal government.

Please feel free to contact me if you have any questions, need additional information, or would like to discuss this issue.

JAMES R. SULLIVAN
Mayor

RESPONSES

Letter 13: Mayor, City of Cave Junction

Thank you for your comments. Please see Letter 20 for cave closure response.

COMMENTS

City of Cave Junction • Home of the Oregon Caves

P.O. Box 1396 • 222 Lister Street • Cave Junction, OR 97523
Phone (541) 592-2156 • Fax (541) 592-6694 • TDD Relay 1-800-735-2900
e-mail: cityofcj@cdsnet.net

March 10, 1998

RECEIVED
MAR 12 1998
OREGON CAVES
NATIONAL MONUMENT

Oregon Caves Company
Attn: Mike Romick
PO Box 128
Cave Junction OR 97523

SUBJECT: NPS General Management Plan

The Common Council of the City of Cave Junction supports the efforts of the private concessionaire to maintain the current operation practices at the Oregon Caves National Monument.

It was the decision of the Council, during the regular meeting of March 9, 1998 to issue a proclamation opposing the Management Plan's preferred alternative "C". A copy of the proclamation is attached.

Please feel free to contact me if you have any questions or need additional information.

JAMES R. SULLIVAN
Mayor

Attachment
Council Proclamation

cc: Superintendent, Oregon Caves National Monument

Affirmative Action / Equal Opportunity Employer

37

RESPONSES

Letter 14: City Council of Cave Junction

Please see NPS responses to Letters 15, 16, 17 and 18 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

PROCLAMATION

A Proclamation of the Common Council of the City of Cave Junction in support of a Private Concessionaire at the Oregon Caves National Monument.

The National Park Service (NPS) issued a draft General Management Plan, dated December 1997, outlining four alternatives for actions at the Oregon Caves National Monument; and Alternative "C"is the preferred alternative; and based on the information provided by the private concessionaire (the Oregon Caves Company), the following issues were provided:

WHEREAS, the private concessionaires have done an excellent job over the decades in providing tourists with quality hospitality services, including cave tours; and

WHEREAS, the concessionaire supports the local community and provides over $50,000 annually to promote the Monument and Southern Oregon; and

WHEREAS, the concessionaire operates the cave tours on a profitable basis with a return to the Government; and

WHEREAS, under the NPS preferred alternative "C", to take over the tour operations, taxpayers will need to subsidize the cave tour operations annually and with no return to the government; and

WHEREAS, the NPS plans to spend nearly $2,000,000 of taxpayer's money to build housing, with limited expenditures needed when a private concessionaire conducts tours; and

WHEREAS, under the proposed action, Josephine County will experience a reduction in property tax payments, while the Oregon State and the U.S. Government will experience reduced tax payments; and

WHEREAS, without active promotion and with the NPS forecasted reduction in cave admissions, the area economy will be seriously damaged by over $1,000,000 annually, and

WHEREAS, it is not in the best interest of the area economy to experience a reduction in cave tour admissions as proposed by the NPS,

NOW, THEREFORE, IT IS PROCLAIMED by the City of Cave Junction that the cave tour operations and scheduling of tours with a private concessionaire and requests the National Park Service reflect this in the General Management Plan.

PASSED by the Common Council of the City of Cave Junction this 9th day of March, 1998.

COMMENTS

RESPONSES

SUBMITTED TO AND APPROVED by the Mayor of the City of Cave Junction this 10th day of March, 1998.

Signed: _____
JAMES R. SULLIVAN, Mayor

Attest: _____
CHARLES J. POLK, Recorder

L-

THE ESTEY CORPORATION

9001 North Lagoon
Portland, OR 97217
Telephone (503) 283-9877
Facsimile (503) 240-7749

March 9, 1998

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Craig Ackerman, Superintendent:

Subject: Oregon Caves National Monument, Draft General Management Plan

I am not familiar with NPS procedures for including into the record items not sent directly to you. Therefore, I am enclosing copies of three newspaper advertisements I placed in the local newspaper and which I wish to have included as part of the record to the NPS Draft General Management Plan.

The advertisements specify some of my concerns over the preferred alternative "C" and the effect this alternative will have on the Oregon Caves Company, the community, tourism in the area, the negative financial impact you will place on the county and state, the significant tax dollars NPS will waste, etc.

Respectfully yours,

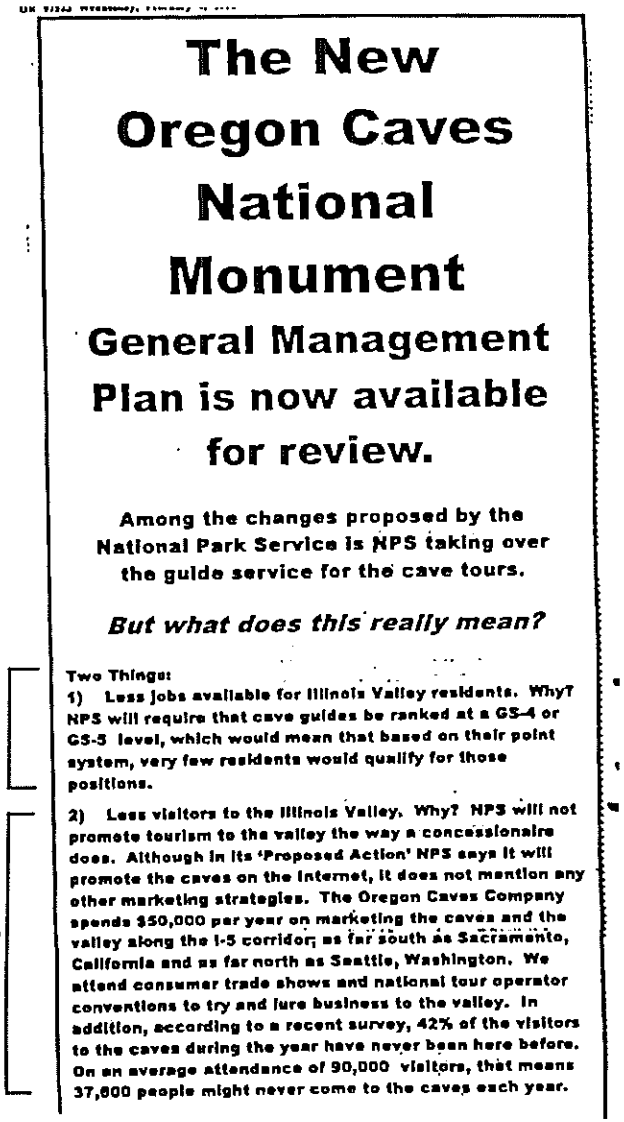
Dick Gordon,
Vice President, Recreational Property Group
The Estey Corporation

Enclosures (3)
DG1068/ch

[redacted]

40

Letter 15: The Estey Corporation



The New Oregon Caves National Monument

General Management Plan is now available for review.

Among the changes proposed by the National Park Service is NPS taking over the guide service for the cave tours.

But what does this really mean?

Two Things:

1

1) Less jobs available for Illinois Valley residents. Why? NPS will require that cave guides be ranked at a GS-4 or GS-5 level, which would mean that based on their point system, very few residents would qualify for those positions.

2

2) Less visitors to the Illinois Valley. Why? NPS will not promote tourism to the valley the way a concessionaire does. Although in its 'Proposed Action' NPS says it will promote the caves on the Internet, it does not mention any other marketing strategies. The Oregon Caves Company spends $50,000 per year on marketing the caves and the valley along the I-5 corridor; as far south as Sacramento, California and as far north as Seattle, Washington. We attend consumer trade shows and national tour operator conventions to try and lure business to the valley. In addition, according to a recent survey, 42% of the visitors to the caves during the year have never been here before. On an average attendance of 90,000 visitors, that means 37,800 people might never come to the caves each year.

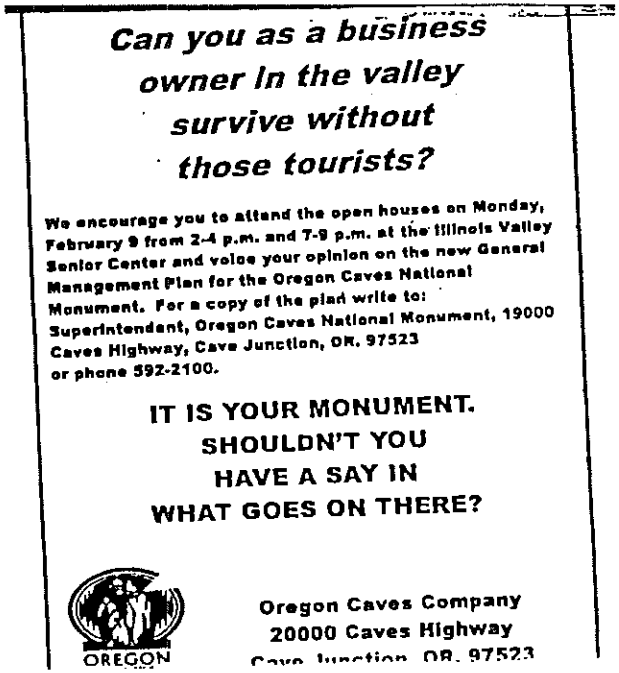
41

Newspaper ad #1

1. The NPS employs the most highly qualified applicants available for all positions through competitive hiring processes. The agency, Congress and the public expects no less. The National Park Service disagrees with your company's claim that local residents are not qualified for the positions proposed in the Plan. We think many local residents are highly qualified and able to compete for these positions at the GS-3, GS-4 or GS-5 level. Local residents have consistently been hired to fill seasonal and term positions year after year at the Monument. All permanent NPS employees at the Monument are residents of Josephine County. Although we cannot discriminate against any class of person in employment practices, it is anticipated that the majority of cave guide positions would be filled by local residents. It is true that additional "points" are given on applications to qualified veterans and disabled veterans. NPS continues to support this policy as does Congress and the public.

2. Your company's statement implies that there would be no promotion of the Monument in the absence of your current program. There is no supportable evidence for this claim. A concession operation will be continued under the proposal and there is no reason to assume that a concessioner would not market available services, such as the Chateau Lodge and food service, as well as the Monument itself. Additionally, the claim is based on the highly dubious assumption that no first time visitors to the Monument would have come without concession advertising. This is simply not consistent with visitation patterns at National Park System areas throughout the country. Further, the NPS already provides thousands of high quality brochures and newspapers to tourism outlets across the region and the country. We also are linked to nationwide promotion of the National Park System, have a variety of interpretive media and Internet access sites, and do considerable outreach with educational systems and community interest groups.

   Nowhere in the GMP does the NPS estimate a loss of 37,800 visitors annually. Using 1996 tour data, even a strict overlay of the 700 person daily carrying capacity would result in only about 850 fewer admissions over the entire year. However, we feel that better scheduling and increased recreational options within an expanded boundary would not result in a reduction but rather an overall increase in Monument visitation. The current limit on cave tours of 1760 persons per day is based on a previous concession contract which permitted tours of 16 persons every six minutes from 8:00 a.m. to 7:00



Can you as a business owner in the valley survive without those tourists?

We encourage you to attend the open houses on Monday, February 9 from 2-4 p.m. and 7-9 p.m. at the Illinois Valley Senior Center and voice your opinion on the new General Management Plan for the Oregon Caves National Monument. For a copy of the plan write to: Superintendent, Oregon Caves National Monument, 19000 Caves Highway, Cave Junction, OR. 97523 or phone 592-2100.

IT IS YOUR MONUMENT.
SHOULDN'T YOU
HAVE A SAY IN
WHAT GOES ON THERE?

OREGON

Oregon Caves Company
20000 Caves Highway
Cave Junction, OR. 97523

p.m. during peak season. These numbers were based on parking lot capacities identified in a 1975 master plan. The limit did not consider resource protection or visitor experience. The limit is not realistic and such visitation numbers have never actually occurred. In fact, even during the busiest days, cave visitation almost never exceeds 50% of that amount. The proposed daily capacity of 700 has been determined by resource management and interpretive specialists to be a reasonable number based on size of passageways and rooms, ability of guides to see visitors and reduce vandalism, and for reduction of crowding and improving of visitor experiences during peak periods. A 1995 Oregon State University (OSU) visitor survey showed that most visitors experienced a degree of perceived crowding on tours and would like a smaller group size with fewer encounters with other tour groups. It is the responsibility of and within the discretionary function authority of NPS managers to make decisions on appropriate visitor use.

Ltr. 1

What the NATIONAL PARK SERVICE DOESN'T TELL YOU In the "*NEW*" Oregon Caves National Monument draft General Management Plan

1

Josephine County will lose $43,966 in property taxes.

From 1993-1997 the Oregon Caves Company paid to Josephine county $43,966 in property taxes. In the Park Services preferred alternative 'C' most or all of that tax money would not be paid in the future because the U.S. government would operate the cave tours, the chalet and the guide shack.

2

The U.S. Government will lose over $320,000 in franchise fees.

From 1994 to 1997 the Oregon Caves Company paid the US Government an average of $19,000 a year in cash franchise fees and paid additional franchise fees by paying excessive water and sewage payments. Plus we are required to charge an average of $1 less for every adult cave tour ticket sold annually or $50,000+ per year

3

The Oregon Caves Company will lose $360,378.40 in cave tour revenue

Annual operational gross revenues from 1993 to 1997 average $952,394. Without the cave tours, the Oregon Caves company will lose an average of $360,378 in revenue each year. From our calculations, based on 20+years experience at the Oregon Caves National Monument, the concessionaire would not have a reasonable opportunity to realize a profit without the cave tour revenue. Public Law 89-249 states "The Secretary shall exercise his authority in a manner consistent with a reasonable opportunity for the concession to realize a profit..." Preferred alternative 'C' fails to project the concessionaire's ability to realize a profit with out the cave tour operation.

4

Loss of $80,000 income tax payments

From 1993 to 1997 the Oregon Caves Company realized an annual average pre-tax profit of $35,478. We are in a tax bracket where we paid, or will pay, approximately $16,000 in state and federal taxes annually, or about $80,000 over five years. All or most of that $80,000 will not be paid in the future if the Park Service's preferred alternative 'C' plan is implemented.

7

The Concession Overall Annual Rating issued by the Park Service shows we are doing a good job.

Every year the Park Service rates the concession's "overall rating determination" for the previous season. Each time we have received the Park Service's highest rating.

8

There will be less jobs available for residents in the Illinois Valley

Because of the Park Service's point system for hiring and assigning jobs, very few if any residents in Illinois Valley will qualify for an interpretive job with the Park Service. Currently the Oregon Caves Company has 50-60% of it's work force including management from the Illinois Valley

9

There will be a decrease in visitation to the Monument

The Park service is preparing to limit the number of people going through the cave to 700 visitors per day by adding a reservations system and decreasing the number of people per tour. What this means is that fewer people will be able to go through the cave during the peak hours of operations. Currently tours can enter the cave every 6 minutes. Under the preferred alternative 'C' tours would enter no closer than every 15 minutes which is going to cause longer waiting for a tour and cause thousands of visitors to be unable to visit the monument because their schedules don't allow them to come back for an available ticket.

10

The Park Service will not market the Oregon Caves as well as the Concession does

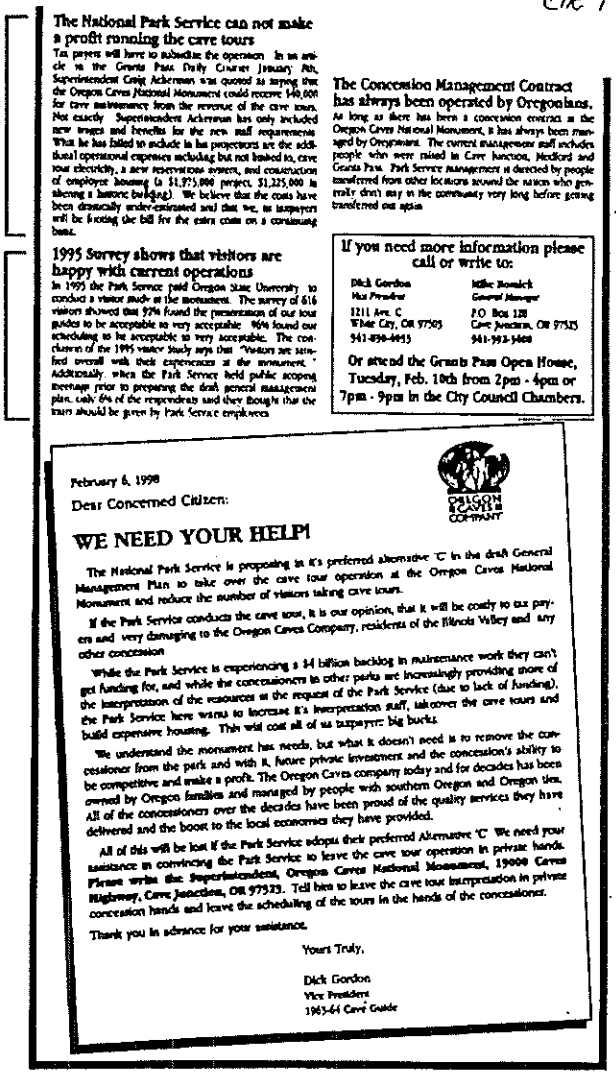
The preferred alternative 'C' lost an opportunity of inter departmental cooperation for an internet project to promote the "new" Oregon Caves National Monument. There are no other marketing strategies listed. The information will be out there but no one will be actively promoting the fact that the caves are available. It will be more like stumbling upon it rather than seeking it out. The Oregon Caves Company spends $50,000 per year to market southern Oregon by attending trade shows and tour operator conventions, distributing brochures from Sacramento, California, to Seattle, Washington, and internationally as well. We spend money in the local communities sponsoring youth athletic teams, events, and donating to charity. All of this will stop if the Park Service takes over the cave tours.

Newspaper ad # 2

1. It is incorrect to state that the County will lose all tax revenues from concession operations at the Monument. The concessioner paid $5,107.47 to Josephine County and the local school district in the 1997-98 tax year. This amount is $947 less than the preceding tax year because the County has lowered the assessed valuation of the property while the mill levy has remained the same. The proposal calls for the NPS to acquiring all the remaining possessory interest at the Monument. However the concessioner would still be expected to pay property taxes to Josephine County and the local school district. This is because the concessioner will have continued beneficial use of the Chateau and Guide House buildings for their operation of lodging, food service and gift sales. Since this represents a majority of the value on which county taxes are assessed, the reduction of property tax revenues to the county and local school district would be expected to be moderate.

2. This figure is incorrect. The annual franchise fee payment of $19,000 cited in the advertisement is not consistent with the total of $320,000 cited over the four year period that is referenced. On estimated cave tour revenues of $360,000 in 1998, the concessioner would pay approximately $7,200 in franchise fees to the government, while retaining $352,800. At this rate, it would take over 44 years to realize a franchise fee loss of the $320,000 cited in the advertisement. Also, current franchise fees paid to the government are purposely kept lower in order to reduce the individual cost of the cave tour to the American public. Further, the advertisement incorrectly implies that no franchise fees would be paid to the government on subsequent contracts. The plan clearly proposes that future concession operations at the Monument continue to provide food service, lodging and gift and merchandise sales to the public. Therefore, franchise fees would continue to be paid to the government on these services.1.

3. Public Law 89-249 does not require that the NPS provide a prospectus that is profitable at a level as defined by the needs or business plan of a specific private company or corporation; only that it allow for a reasonable opportunity for profit. The opportunity can be profitable as a corporate venture, a small business or sole proprietorship. The law also does not require NPS to provide concession services to the public at any unit of the National Park System. Rather, it requires that if NPS determines that concession services are necessary and appropriate, a prospectus be developed that provides a



Exc 1 pg.

The National Park Service can not make a profit running the cave tours

Tax payers will have to subsidize the operation. In an article in the Grants Pass Daily Courier January 8th, Superintendent Craig Ackerman was quoted as saying that the Oregon Caves National Monument could receive $40,000 for cave maintenance from the revenue of the cave tours. Not exactly. Superintendent Ackerman has only included new wages and benefits for the new staff requirements. What he has failed to include in his projections are the additional operational expenses including but not limited to, cave tour electricity, a new reservations system, and construction of employee housing (a $1,975,000 project, $1,225,000 in showing a historic building). We believe that the costs have been drastically underestimated and that we, as taxpayers will be footing the bill for the extra costs on a continuing basis.

5

1995 Survey shows that visitors are happy with current operations

In 1995 the Park Service paid Oregon State University to conduct a visitor study at the monument. The survey of 616 visitors showed that 97% found the presentation of our tour guides to be acceptable to very acceptable. 96% found our scheduling to be acceptable to very acceptable. The conclusion of the 1995 visitor study says that "Visitors are satisfied overall with their experiences at the monument." Additionally, when the Park Service held public scoping meetings prior to preparing the draft general management plan, only 6% of the respondents said they thought that the tours should be given by Park Service employees.

6

The Concession Management Contract has always been operated by Oregonians.

As long as there has been a concession contract at the Oregon Caves National Monument, it has always been managed by Oregonians. The current management staff includes people who were raised in Cave Junction, Medford and Grants Pass. Park Service management is directed by people transferred from other locations around the nation who generally don't stay in the community very long before getting transferred out again.

11

If you need more information please call or write to:

Dick Gordon *Vice President* 1211 Ave. C White City, OR 97503 541-830-4415	Mike Bonnick *General Manager* P.O. Box 128 Cave Junction, OR 97523 541-592-3400

Or attend the Grants Pass Open House, Tuesday, Feb. 10th from 2pm - 4pm or 7pm - 9pm in the City Council Chambers.

February 6, 1998

Dear Concerned Citizen:

OREGON CAVES COMPANY

WE NEED YOUR HELP!

The National Park Service is proposing in it's preferred alternative 'C' in the draft General Management Plan to take over the cave tour operation at the Oregon Caves National Monument and reduce the number of visitors taking cave tours.

If the Park Service conducts the cave tour, it is our opinion, that it will be costly to tax payers and very damaging to the Oregon Caves Company, residents of the Illinois Valley and any other concession.

While the Park Service is experiencing a $4 billion backlog in maintenance work they can't get funding for, and while the concessioners in other parks are increasingly providing more of the interpretation of the resources at the request of the Park Service (due to lack of funding), the Park Service here wants to increase it's interpretation staff, take over the cave tours and build expensive housing. This will cost all of us taxpayers big bucks.

We understand the monument has needs, but what it doesn't need is to remove the concessioner from the park and with it, future private investment and the concession's ability to be competitive and make a profit. The Oregon Caves company today and for decades has been owned by Oregon families and managed by people with southern Oregon and Oregon ties. All of the concessioners over the decades have been proud of the quality services they have delivered and the boost to the local economies they have provided.

All of this will be lost if the Park Service adopts their preferred Alternative 'C'. We need your assistance in convincing the Park Service to leave the cave tour operation in private hands. Please write the Superintendent, Oregon Caves National Monument, 19000 Caves Highway, Cave Junction, OR 97523. Tell him to leave the cave tour interpretation in private concession hands and leave the scheduling of the tours in the hands of the concessioner.

Thank you in advance for your assistance.

Yours Truly,

Dick Gordon
Vice President
1963-64 Cave Guide

reasonable opportunity for profit. It is wholly within the discretionary function of NPS managers to determine which services may be necessary and appropriate to be offered under concession contract. Under the proposal, a concession operator would continue to have gross revenues generated by food service, lodging, and gift and merchandise sales. Concession finance specialists from the NPS Concessions Program Center have completed an analysis on the proposed concession services package that indicates a reasonable opportunity for profit would exist.

4. The dollar claim of lost income tax revenues to state and federal governments seems to be made on faulty assumptions. First, the advertisement incorrectly implies that there will be no concession operation at the Monument, and therefore all tax revenues will be lost. The proposal clearly identifies a continuing role for concessions at the Monument. The advertisement claims that the Oregon Caves Company pays approximately $16,000 per year in combined state and federal income taxes on an approximate annual gross revenue of $900,000. This represents an approximate 1.8% rate on gross revenues. At an estimated $500,000 to $600,000 annual gross revenue on remaining services, a concessioner would continue to pay $9,000 to $10,800 annually under the proposal; even at the very low 1.8% rate. Further, the proposal anticipates using most of the fees generated by the public tours to fully cover costs of labor to provide the services. The current estimate for NPS personnel expenses is $280,000. Those wages represent personal income that is subject to federal and state taxes. Those wages would generate direct tax payments to both the state of Oregon and the United States.

5. The proposal does not state that an objective of the NPS is to make a profit by charging admission to a publicly owned resource. Rather, the proposal indicates that even at rates lower than those currently charged, there would be sufficient revenues to cover direct operating costs for cave tours as well as providing some funding for resource management and maintenance programs that support or are affected by cave tours. Personnel costs for the reservation system are included in those estimates. A decision has also not been made whether or not to contract for these reservation services. A decision also has not been made whether or not to contract for these

reservation services. Initial equipment costs are considered in the renovations at the Illinois Valley Visitor Center and the Chalet. Further, the need for an on site visitor center and employee housing would be met even in absence of NPS guided tours. Therefore, it is inappropriate to attempt to portray the costs of renovation of these facilities as a direct operational costs of NPS guided tours.

6. The assertion that only 6% of respondents to public scoping session thought that NPS should give tours is misleading and inaccurate. The public scoping process was an opportunity for the public to raise issues of concern which the planning team may have omitted, overlooked or not emphasized adequately. To that end, only 6% of the total comments specifically addressed cave tours. Of those comments, 100% supported the NPS proposal to directly provide interpretive cave tours. During the public comment period concluded in March 1998, nearly 1000 responses were received to the draft proposal. A significant majority of those responses supported the proposal that includes cave tours by NPS employees.

7. The Oregon Caves Company has received "satisfactory" ratings on the overall performance of contractually required services including food service, lodging and merchandise sales. This rating does not imply a "good" or "excellent" rating for any particular service, especially the public cave tours. The history of concession led interpretation has been inconsistent. During the two scheduled periodic evaluations in 1997, concession interpretive services received ratings of three (satisfactory) and two (marginal) on a rating scale of one to five. In 1996 the *average* audit score for concession guides was 79.7 while a passing score was 80. Previous concession guides, including one of the most respected head guides, have commented in writing that the public and resources would be best served by NPS led interpretive tours.

8. Please see response to Ad #1, item 1.

9. Please see response to Ad #1, item 2.

10. Once again, the advertisement incorrectly implies that there will be no concession operator if the NPS provides cave tours or that a concessioner will stop promoting available services or participating in community activities. The latter assumption is purely speculative and highly unlikely. Further, there is no documentation as to the effect of concession promotion or marketing on visitation. In fact, as claimed expenditures for promotion have increased over the past several years visitation has actually shown some decline.

11. The NPS cannot discriminate against any potential concession contractors based on their residence or place of origin within the United States. The Oregon Caves Company has a preferential right of renewal in responding to the new prospectus for concession services that will be put forth after the Record of Decision for the proposal. If the company chooses not to exercise this right, other prospective concessioners from the state of Oregon will be fairly considered for award of a new contract.

    The contention that concession management and staff are somehow more legitimate members of the local community than NPS staff is misdirected and unfair. Monument staff and their families live and work in the local community. They purchase homes; pay rents and taxes; spend money in local establishments; attend local churches; support local schools which their children attend; and, are members of local civic and volunteer organizations. With regard to time of service at specific NPS sites, the current management at the Monument has been working at Oregon Caves considerably longer than any management or staff member from the Oregon Caves Company.

COMMENTS

RESPONSES

$4,255,000 In Taxpayer Money

Enc 3

IS THE MONEY BEING WASTED?

YES!

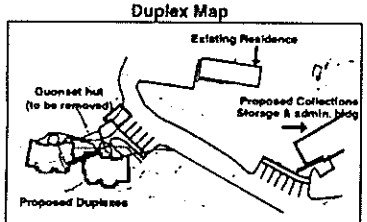
In the Draft General Management Plan for the Oregon Caves National Monument, the National Park Service in Preferred Alternative "C" will assume operation of the Cave Tour Service from the Oregon Caves Company.

To implement Preferred Alternative "C" the park service is requesting from the taxpayers:

1 • An additional **$270,000** annually in new tax payer money to manage the Monument, with some of the money for subsidizing the Cave Tour Operations. **Excessive? YES!**

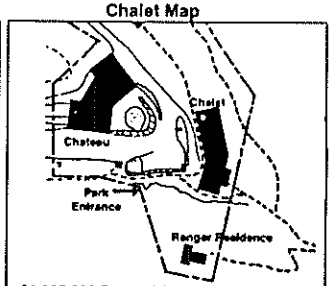
2 • **$4,255,000** in capital projects when there is already a $4 billion backlog in existing N.P.S. system maintenance projects. **Excessive? YES!**

Duplex Map



$375,000 to build each Park duplex, and they don't have any Land costs. Excessive? YES!

Chalet Map



$1,225,000 Remodel the 2nd & 3rd floors of the Chalet for Park Service employee housing.

The only way to change the direction the National Park Service is planning is to express your views to the Superintendent before March 13, 1998.

Write:

SUPERINTENDENT
Oregon Caves National Monument
19000 Caves Hwy.
Cave Junction, OR 97523

For a detailed explanation for the proposed alternative ask for a copy of the 226 page Draft General Management Plan to be sent to you.

OREGON CAVES COMPANY

Oregon Caves Company
20000 Cave Hwy.
Cave Junction, OR 97523
592-3400, Fax 592-6654
www.crater-lake.com/caves/

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Newspaper ad # 3

1. The estimated increase in annual operating expenses is not due to expenditures for cave guides. In fact, projected revenues from cave tour fees will cover not only the cost of seasonal ranger guides but also guide supervisors and other personal interpretive services outside the cave, such as nature walks and evening campground programs. The increase in operating costs is largely attributable to the operation of the on-site visitor center and increased maintenance, law enforcement, and resource management cost associated with the boundary change.

2. The $4.255 million estimate for capital improvements is a planning estimate only for projects that will be needed over the entire 15 to 20 year expected life of the plan. Some of the projects listed in the proposal were already in the planning stage at the onset of the General Management Plan process. Those projects, representing about 35% of the projected costs, were combined into the GMP for efficiency of planning and to consolidate compliance actions. Some of the estimated overall cost includes projects that are part of the NPS backlog referred to in the ad.

   The capital improvement proposals have been carefully analyzed and represent real needs for accomplishing the mission of the Monument over the next 20 years. Some of the projects are replacements for buildings that are unsafe for habitation. One building proposed for replacement was damaged beyond repair by landslides and has been demolished.

   The need for an on site visitors center has been clearly identified by both the NPS and public comment. Costs for adaptive reuse of existing facilities are considerably lower than construction of a new facility to meet this need.

   The housing needs for the Monument have been verified by an independent contractor in a recently completed housing needs assessment. Housing would be available to meet both NPS and concessioner seasonal needs.

National Park Service's proposal to cost Southern Oregon over $1,000,000 in annual revenue and increase costs to taxpayers.

BEWARE!

If the National Park Service's Draft General Management Plan Preferred Alternative "C" goes into effect and they assume operation of the Cave Tours from the Oregon Caves Company, the southern Oregon region and the Oregon Caves Company are the Big Losers!

What Happens?

1
- Reduction in thousands of paid Cave Tour admissions through their proposed scheduling.
- Reduction of conservatively 10,000 paid Cave Tour admissions through reduced promotion of the Cave Tours.
- Local Businesses will be hurt by over $1,000,000 in annual tourist revenue when these reductions occur.
- Caves operations removed from the Josephine County tax rolls.
- An estimated $80,000 in equivalent annual franchise fees will no longer be paid to the government.
- Reduced State and Federal income taxes will be paid by the Oregon Caves Company.

2
- An additional $270,000 per year in taxpayer money will be needed to subsidize the operation of the Monument.

The only way to change the direction the National Park Service is planning is to express your views to the Superintendent before March 13, 1998.

Write:

SUPERINTENDENT
Oregon Caves National Monument
19000 Caves Hwy.
Cave Junction, OR 97523

For a detailed explanation for the proposed alternative ask for a copy of the 226 page Draft General Management Plan to be sent to you.

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Oregon Caves Company
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Cave Junction, OR 97523
592-3400, Fax 592-6654
www.crater-lake.com/caves/

Newspaper ad # 4

1. See response to newspaper ad #1.

2. If the proposal is implemented, there should be no additional burden on the taxpayers to conduct cave tours. No additional appropriated funds are being requested to operate tours. Revenues generated from tour fees would exceed the costs of providing the tours, in effect returning additional funds to the government to pay for support functions for the cave operation. Such use of cave tour revenues could actually decrease the amount of funding requested from public sources for cave projects. Nearly 84% of visitors in an Oregon State University survey identified as their preference the return of cave tour fees to the Monument for maintenance and operations. The increased funding identified in the plan is for operation of the visitor center, increased resource management and research, maintenance and wildland fire protection. It should be noted that development of an on site visitors' center was also identified as an important need by visitors in the 1995 OSU study.

THE ESTEY CORPORATION
5001 North Lagoon
Portland, OR 97217
Telephone (503) 285-9877
Facsimile (503) 240-7749

March 13, 1998

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Craig Ackerman, Superintendent:

Subject: Oregon Caves National Monument, Draft General Management Plan
Visitor Center

I request you reconsider your preferred alternative "C" to use as a visitor center the first floor of the Chalet. We need this building for our gift store, gift warehouse operations, and team member/manager housing.

1 Your planning process did not consider the financial impact your preferred alternative would have on the concessionaire's ability to continue to hire a management team, provide team member/manager housing, and earn a profit from this part of the concession operation. Your planning process did not consider the visitor and the impact this would have on them.

Because you kept everything a secret and kept us in the dark during the planning process, we had no idea that you were considering this location as an option. If we had known, we would have had questions, and following receiving answers, we would have asked for a meeting to share with you our thoughts.

We are asking for those meetings now.

2 Al Hendricks, your staff, and you made it known during the recent open houses that you had made your decisions. You all made it clear that this is not a popularity contest, that you were not interested in public input but were using the open house format for a required hearing to lesson possible input from people not agreeing with your preferred alternative. With that type of attitude a meeting is a waste of time and if that is the case there is no sense in meeting.

Respectfully yours,

Dick Gordon, Vice President
Recreational Property Group
The Estey Corporation

ORCA4

[redacted]

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Letter 16: The Estey Corporation

1. We disagree with your statement that the planning process did not consider the financial and other impacts associated with the proposal. Reductions in gross revenues were considered and it was determined that a smaller, cost efficient, combined operation providing food service, lodging, and gift sales could be profitable. This position was further supported by reduced demands on a potential concessioner's expenses represented by NPS acquisition of possessory interest in facilities and furnishings.

   Primacy in prioritization of alternatives was placed on accomplishment of the mission goals of the NPS. Since we are limited both topographically and financially in developing a new visitor center building it was deemed that providing visitors with basic orientation and interpretation in the available space in the historic Chalet is a higher priority than a large gift shop. The existing gift shop sales area utilizes about 1800 square feet. A reduction in area of only about 300 square feet is proposed for the Chateau location of this function. There is also a possible synergistic effect of adjacent location of food service and gift sales. Many parks and show caves throughout the country have effectively used this strategy.

   It is anticipated that all available quarters in the upper levels of the Chalet will not be utilized by NPS personnel. It is the policy of the NPS to limit on site housing whenever possible. Unassigned quarters will be made available to a concessioner for employees for whom there may be a legitimate need for on site housing.

2. There is no validity to the statement that field unit staff or management have made final decisions regarding the proposal before consideration of public comment. The official Record of the Decision for the proposal is issued by John Reynolds, Regional Director, Pacific West Region of the NPS. The entire public process associated with the proposal is designed to seek and consider comment on the various alternatives. While the number of responses in support or opposition of specific issues does not determine decisions, the input has been carefully considered, and changes, additions or deletions are made as appropriate with respect to policy, regulation, and laws that govern operation of the NPS. The NPS also held a separate private meeting with concession staff at the beginning of the planning process.

COMMENTS

THE ESTEY CORPORATION
3001 North Lagoon
Portland, OR 97217
Telephone (503) 285-9877
Facsimile (503) 240-7749

March 13, 1998

RECEIVED
MAR 15 1998
OREGON CAVES NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Craig Ackerman, Superintendent:

Subject: **Oregon Caves National Monument, Draft General Management Plan**
Money Matters

Background

The draft General Management Plan (GMP), preferred alternative "C" calls for NPS to take over cave tour operations, including interpretation services, from the concessionaire; to operate from the Chalet, a concessionaire occupied building; and to operate from the guide dormitory, another occupied concessionaire building. It does not make economic sense for NPS to operate the cave tours, operate from the Chalet, and operate from the guide dormitory. The NPS proposal will result in serious negative financial consequences to the concessionaire, the local economy, the County, the State of Oregon, and taxpayers everywhere who will need to subsidize the NPS preferred alternative.

See enclosures 1 and 2 for details. See discussion below.

The Oregon Caves Company – Currently

At the current time the concessionaire, the Oregon Caves Company, is a profitable for-profit company which strongly supports the Monument and the Southern Oregon area. The company is important economically to the area. The company currently:

- Generates nearly $1,000,000 annually in service revenue.
- Spends $50,000 annually in advertising/promotion of the Monument and the area.
- Pays property taxes on the 4 buildings on the Monument and based on cave tour revenue, property taxes on the land in the Monument. From 1993 to 1997 we paid $43,966 in property taxes to support schools and county services.
- Pays approximately $60,000 annually in cash and non-cash franchise fees to NPS and the U.S. Treasury. This takes form in a 2% franchise fee, a reduction from comparable in cave tour ticket rates (required by contract), and payment of excessive water and sewer fees.

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RESPONSES

Letter 17: The Estey Corporation

1. Please see responses to Letter 15.

2. The Monument is a publicly owned resource supported through tax revenues. Appropriated funding supports all activities on the Monument including resource management, research, fire protection, emergency medical services, search and rescue, maintenance, environmental education, community outreach, and law enforcement to name but a few. User fees for cave tours would be charged under any scenario, whether collected by the NPS, a concessioner or a non-profit organization. Fees currently charged by a concessioner are set at a level to cover operations plus an additional amount for profit. Fees charged by NPS would be set at a level that would cover direct costs of interpretive services and direct support activities such as maintenance. An additional amount for profit would not be necessary. It is possible that fees could be reduced from current levels or used to support other ranger-led interpretive, resource management and education programs elsewhere within and outside the Monument. Rates would reflect the public investment in the Monument that does not exist in private show caves.

3. This statement is incorrect. Direction from Congress and procurement policy indicate that agencies purchase from small business whenever possible. The majority of materials and supplies purchased at the Monument are transactions with local vendors.

- Pays considerable state and federal income taxes. Paid over $100,000 from 1993 to 1996.
- Gives priority hiring to local residents for entry level and management positions. Gives priority to local residents for training. 30% to 40% of the team are from the Cave Junction area.
- Buys locally whenever possible.
- Supports the local community, sponsoring youth athletic teams, events, and donating to charity, including the donation of hundreds of cave tour tickets.

<u>If NPS Operates the Tours – What Happens</u>

- The proposed scheduling of tours with a carrying capacity will result in the loss of over 5500 paid admissions annually. See enclosure 3.
- The $50,000 the company spends annually on marketing/promotion will be gone. Conservatively, this will result in a further loss of over 10,000 paid cave tour admissions annually.
- Using Oregon tourism department statistics, the reduction of 15,500 paid admissions will result in a loss of over $1,000,000 in tourist revenue for the area.
- NPS needs nearly $2,000,000 to provide housing for the new government employees. This money comes from taxpayers. There is no way the cave tour revenue can pay taxpayers back (enclosure 4). 1
- Part of the $270,000 NPS is requesting annually to be added to their operating budget will be used to subsidize the cave tour operations.

Craig Ackerman estimates all the revenue from ticket sales will pay interpreter salaries and benefits with $40,000 left over (see enclosure 3). The $40,000 is not sufficient to pay for ticket sellers, a reservation system and maintenance of the system, pay the caves electric bill, etc. Craig Ackerman also overstates revenue because he has assumed that without the company's $50,000 annual expense for marketing/promotion that there will be no reduction in paid admissions.

Craig Ackerman suggests a ticket price increase if needed to cover expenses. Interesting. NPS has preached to me about the admission price being higher than other NPS caves, they want a lower price so more people can afford to go through the cave, and that Craig Ackerman and Al Hendricks simply don't want the price to go up (see enclosure 5).

Enclosure 5 was sent as a result of my request for a higher ticket price so I could pay our cave guides more. Of course in enclosure 3, Craig says he can increase the ticket price to raise additional revenue. Craig, you are talking out of both sides of your mouth.

[redacted]

2 • Taxpayers will get to pay twice for a cave tour. Once when they buy a cave tour ticket and again when they pay federal taxes.

3 • NPS does most of their buying by Government contracts. Local businesses will suffer.

• A reduction in jobs for the local area will occur. NPS hires off a list Based on my experience at Crater Lake National Park, hiring off the list results in very few people from the local area being hired into interpreter positions.

NPS Can Have the Best of Both Worlds

- NPS can continue to have a healthy concessionaire who operates the cave tours and who supports the area as described above, with a good return on investment going to NPS or the U.S. Treasury. NPS would be supporting the community and area.
- NPS can have total control over the concessionaire cave tour interpretation program through Section 23 of the operations plan between NPS and the concessionaire and as described in another letter. That's better than hiring your own interpreters.
- Have franchise fees coming from the concessionaire to help pay for Monument projects.
- Less reliance on a federal government budget process which can sharply change the amount of funds available.

Your current preferred alternative "C" would have a significant negative economic impact on the area and region.

Please reconsider your preferred option "C" and leave cave tour operations with the concessionaire and don't compromise the tickets which can be sold until you have documentation that the current tour scheduling, unreasonably puts the caves at risk.

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Yours truly,

THE ESTEY CORPORATION

Dick Gordon, Vice President
Recreational Property Group
The Estey Corporation

Enclosures (5)
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March 13, 1998

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Craig Ackerman, Superintendent:

Subject: Draft General Management Plan (GMP), Carrying capacity and cave tour scheduling.

Background

The draft GMP, preferred alternative "C", limits the number of visitors who can go on cave tours. The preferred alternative reduces the number of visitors able to purchase tour tickets. Each cave tour will have a maximum of fourteen per tour from the current sixteen, allows one tour to enter the cave every fifteen minutes (four tours per hour) from the current six minutes (ten tours per hour), and reduce the daily maximum tickets available to seven hundred.

Action Requested

We request NPS reconsider the preferred alternative and not abandon the current system which is working well for park visitors and does not pose any threat to the cave natural resources. See issue paper attached for details (enclosure 1).

Artificial Carrying Capacity

Until 1995 I never heard of the carrying capacity issue. Resting the cave during the winter months, having fewer than sixteen people per tour for people managing purposes, and the lights damaging the cave natural resources are items discussed from time to time.

1 The emphasis to us from NPS through 1994 was to serve the public by having appropriate guide staffing and scheduling. Suddenly in 1995, NPS

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Letter 18: The Estey Corporation

1. The NPS is required to consider carrying capacities in the development of a general management plan. The fact that no definitive capacity (with respect to resource protection or visitor use considerations) had been previously identified is not justification for failure to consider such capacities. Current tour schedules were developed without consideration of impact on resources or best methods for delivery of interpretation (see NPS response to letter 15.) Rather, they address maximizing the number of paid admissions that can be taken through the cave in the shortest possible time with the smallest possible guide staff. The statement that the current method of scheduling tours has not negatively effected the cave is not supportable and inconclusive at best. Preliminary research indicates that size and frequency of tours does have an impact on cave resources.

   Improving visitor experience through reduced crowding has been identified as a desired outcome at many national park sites throughout the system. This concept is directly supported by feedback from visitors. In the case of Oregon Caves, most visitors report that they would prefer a very low number of encounters with other groups while in the cave. They also expressed a high degree of perceived crowding and a feeling of being "rushed" through the cave. NPS interpretive specialists and managers have the responsibility and discretionary authority to determine appropriate visitor use levels based on available information and professional judgement.

2. The maximum hours of cave tour operation for Alternative C were in error and have been corrected. The current schedule allows for a maximum of 12-1/2 hours of lighting operation a day, not 10 hours as stated in your letter. The proposal would reduce, not increase the number of hours that lights are operated each day. Additionally, less frequent scheduling of tours would allow lighting to be turned off in sections between tours.

3. Both NPS experience and feedback from visitors disagree with your personal views that close scheduling of tours with consequent crowding provides an improved interpretive experience.

4. The tourism assessment completed by Wetter and Associates for the Illinois Valley was not the basis for determining interpretive tour scheduling for the proposal.

leadership starts talking about limiting the number of tickets to be sold daily and separating the tours by fifteen minutes.

1 There has been no research or documentation to support the reduction in daily capacity or in only allowing a tour to enter the cave every fifteen minutes. The current method of scheduling tours has not negatively affected the cave natural resources.

Current scheduling allows for adjusting the number of tours daily and the frequency of cave tours entering the cave daily based on ticket sales. During the shoulder season, tours run from four tours per day to one tour every twenty minutes during busier days or parts of a day. During the summer prime season the time between tours is normally ten minutes except on an average of twenty-five days per year when for part of the day, tours are scheduled six minutes apart. The scheduling works and is visitor friendly.

A reservation system, although expensive, could further improve the visitor friendliness of the current scheduling system.

NPS Schedule

The majority of cave tour tickets are sold for tours between noon and three P.M. This represents the prime time period when a majority of visitors will reach the monument.

The Monument is not a destination resort for visitors. The Monument visit for a cave tour is more of an impulse activity, decided at the last minute. Most visitors do not plan a vacation trip around a visit to the Monument. The visit is a same day decision.

Allowing one tour into the cave every fifteen minutes will result in longer waits or people by-passing the monument because their impulse decision will not allow them the time to wait in the area. The NPS schedule during the busier part of the summer will eliminate many visitors from being able to buy tickets because all the tickets will have been sold. We average twenty days per year when ticket sales exceed the NPS proposed 700 daily maximum and frequently the 700 plus ticket sale days run consecutively.

The NPS proposed schedule of limiting carrying capacity to 700 daily and fifteen-minute separation is not visitor friendly.

Lighting

The number of hours the cave lights are on daily and yearly has been discussed for years. The alga growth from the lights is most noticeable in the

cave. Hopefully, the new cave lighting system will reduce the alga problem and will allow for modified usage of the lights during the shoulder seasons.

2 The NPS proposed schedule calls for cave tours to be scheduled for twelve hours daily during the summer season. The current schedule only schedules tours for ten hours daily and because it is flexible scheduling, most busy days need less than ten hours of scheduling time. At two hours per day difference for 100 days (approximate), the current schedule has the lights off for 200 plus hours more than the NPS proposed schedule. The current scheduling method is better for the caves' natural resources.

If documented research shows the caves should be rested from lighting, then we support resting the cave during the winter months.

Bumping

3 NPS wants each cave tour to never see another tour in the cave and they have used this argument as a prime reason for scheduling cave tours fifteen minutes apart. We know of no justification for this attitude.

Having recently been through several tours at Mammoth Caves and talking to friends who recently went through Carlsbad Caverns, seeing another group is not unusual. Having personally taken over 1,000 tours through the Oregon Caves, having spoken to four past head guides and one long term company general manager, none of us see a downside to tours seeing each other in the cave and tours bumping into each other once in a while. It does not take away from the visitor experience.

Bumping can mean that a guide is doing a good job in adjusting to meet the needs of the tour groups for information, to meet the physical capability needs of the visitors, allows for improved management of visitors, more immediate help available in case of an emergency, etc. Bumping in the ghost room area allows guides to share information with another tour, a positive happening. Based on our extensive experience, we see not downside to bumping.

March '94, Illinois Valley Tourism Assessment

The Oregon Economic Development Department to assist rural communities in the first steps in implementing a Rural Tourism Development Project commissioned a study in the Illinois Valley to identify and outline potential tourism development strategies. Michael Wetter and Associates was commissioned to complete the assessment. Copy of the preliminary assessment is attached (enclosure 2).

NPS has used the preliminary assessment to find support for their cave tour preferred scheduling. We fail to see any connection between the two.

We could only find a preliminary draft of the Wetter Assessment. The assessment was never approved by any group in the Illinois Valley. Therefore, the assessment has no standing and it is inappropriate to use it as documentation in a planning document. Furthermore, the assessment states: "there is still not a consensus in the area about whether tourism should be pursued aggressively."

4

The Illinois Valley community could implement strategies suggested without NPS forcing visitors to hang around for hours waiting for a cave tour. NPS offering poor hospitality service is not a positive way to encourage the Illinois Valley community to package visitors' services.

Conclusion

NPS leadership has misplaced common sense with their personal views on carrying capacity and cave tour scheduling. There is no documentation that supports their personal views. Please don't abandon current methods, which are hospitality orientated and visitor friendly.

Yours truly,

THE ESTEY CORPORATION

Dick Gordon, Vice President
Recreational Property Group
The Estey Corporation

Enclosures (2)
ORCA5

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March 13, 1998

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Craig Ackerman, Superintendent:

Subject: Oregon Caves National Monument, Draft General Management Plan
The Planning Process Used

1 As an outsider looking in at your planning activities during the past 2 years, it appears you have been completing your draft general Management plan in a vacuum. Yes, you probably did everything according to NPS standards, so everything is technically correct, but you failed to include in the process those people or organizations the draft plan would affect. The one exception is possibly the Forrest Service.

2 My staff and I possess as much knowledge if not more knowledge about certain aspect of the property than NPS. My personal association with the property dates back to the late 1950s and into the 1960s when I worked for the Oregon Caves Company while attending college. We could have discussed with you alternative ideas about the cave tour operations, employee housing, visitor center, etc. If we had only known what you were thinking about and had been invited to provide continuing input and if you had sought continuing input from the communities affected by the preferred alternative, I believe you could today have a much better plan. Now we find ourselves in a position that we must react to the proposed alternative, rather than be supportive of the proposed alternative.

I should not have been surprised at the draft GMP being written in a vacuum, because I saw the same thing happen at Crater Lake National Park for a draft Visitor Service Plan. The plan was written in total secrecy, without the value of continuing input from those who the various alternatives would affect.

NPS has a leadership roll to fulfill in the planning process. Enlightened leaders don't resort to secrecy and total control as a way of providing the leadership.

I was involved with NPS in the development of a winter use plan at Crater Lake National Park. Neither my staff nor I were excluded from the process. We had an opportunity for continuing input during the planning process. We felt our input was important and valuable. We felt good about ourselves. We supported the preferred alternative.

3 Al Hendricks, your staff, and you made it known during the recent open houses that you had made your decisions. You all made it clear that this is not a popularity contest that you were not

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Letter 19: The Estey Corporation

1. The NPS planning team, which was made up of representatives from both the Monument's staff and the Seattle Support Office staff, made extensive effort to involve the public in the preparation and review of the management plan for Monument. Early in the planning process, a series of public scoping meetings were held in the region during March, 1996 at the Illinois Valley Senior Center and in Grants Pass at the City Council Chambers. In addition, a public newsletter was handed out during this early phase to acquaint both park visitors and area residents with the issues to addressed during planning and to actively solicit public input as to other issues or concerns that the planning team needed to address. Several thousand copies of this newsletter were distributed, including an insert into the (Illinois Valley newspaper) and handouts at the Monument and IVVC in Cave Junction. In addition to public scoping meetings, individual meetings were also held with interested groups and the district and forest supervisors staff of the Siskiyou National Forest. The SNF staff was also invited to be part of the planning team. Written responses were also encouraged from the public in addition to the input received during public scoping meetings.

A separate meeting was also held early in the planning process with representatives from the Estey Corporation on March 19, 1996, and subsequent discussions were held between company officials and park staff on numerous occasions.

Additional public input was sought during the release of the draft GMP/EIS to the public starting in late December, 1997. A 90 day public review period included both opportunity for written and verbal comment. A series of four public workshops; two in Cave Junction and two in Grants Pass, were held in February to solicit comment. Additionally a second public newsletter was published with a mail-back postage paid response form to solicit public comment. The GMP/EIS was placed on the Internet in the NPS Homepage under Oregon Caves National Monument. Over 980 individuals and groups commented on the plan via letters, newsletter mail-back forms, and the Internet. Extensive comments were received from both area residents and park visitors, providing a wide range of input and comment on the proposed action and the other alternatives included in the EIS.

3 interested in public input but were using the open house format for a required hearing to lesson possible input from people not agreeing with your preferred alternative.

My background includes considerable work in planning. The planning has mostly been in the private sector for medical services and facilities. Can you imagine the mess I would have found myself in if I had gone to doctors and patients at the start of the planning process, asked them what they thought the future should/would be, and then writing a plan of action, including facilities needed, without continuing to include all the involved partners at each step in the planning process? The first thing which would have happened is I would have been fired, and rightfully so.

I also have a public planning background having served on the Planning Commission and the Architectural Review Commission for the City of Medford, Oregon. Again the value of continuing input from the parties involved is what makes the process successful with the best end results.

4 The draft GMP has failed to provide a reasonable approach to gather input on a continuing basis during the process and if alternative "C" continues to be the preferred alternative, then we request NPS start the process over. I am aware NPS took a short cut in the normal planning process for the draft GMP and the shortcut has not provided for sufficient input and discussion on the alternative "C" preferred alternative.

I have read the NPS publication Social Science and the National Parks, An Introduction (enclosure 1). The publication states:

> "To protect plant and animal species, park managers need basic scientific information about their habitats, ranges, life cycles, and more. To protect the parks themselves, however, managers need to understand people – the U.S. citizens and international travelers, who establish, visit, support, cherish, use, a.id (sometimes) abuse America's national parks and park resources. Understanding people means conducting research in the social sciences – including the fields of economics, psychology, geography, sociology, and political science. Park managers can use information from social science research to protect park resources, better serve visitors, and save taxpayers money."

The publication further states:

> "National Park Service (NPS) managers face unprecedented needs to better understand the public's values, attitudes, and behaviors. They (managers) must continue to develop state-of-the-art visitor management techniques. And they must learn more about the communities and regions adjacent to park lands, as the people living nearby continue to become more involved in making decisions about the parks."

5 The planning process to date at the Oregon Caves National Monument has failed to take people into consideration or to address any Social Science issues with the preferred alternative.

On the attached issue paper, which supports the concessionaire continuing to conduct cave tours, NPS has failed to consider the excellent job the current concessionaire and their predecessors have done in conducting tours. 92% of 616 visitors surveyed in a 1995 survey commissioned by NPS found the quality of the tour guide presentation to be acceptable or very acceptable, with 0% finding the quality unacceptable or very unacceptable. See the attached issue paper (enclosure 2) for supporting and additional information.

[redacted]

2. During public scoping and in the separate meeting we had with Estey Corporation Staff at that time, Estey management was informed that the operation of the cave and cave tours was an issue that was going to be addressed within the framework of the plan, and that there would likely be alternatives which called for the NPS interpretive ranger staff to assume the responsibility of interpreting the primary Monument resource, Oregon Caves, to the American public.

3. In a draft document, the proposed action is that—a proposal. It does not become the plan for Oregon Caves National Monument until the Record of Decision on the Final Environmental Impact Statement is signed, which can be no earlier than 30 days after the Notice of Availability of the Final GMP/EIS appears in the *Federal Register*. Between the Draft and Final GMP/EIS, changes can, and have been made to the document based upon public comment and the input of other agencies and organizations such as the USFS. These concerns, comments, and corrections have been duly noted, and many changes in the final GMP/EIS reflect these changes.

4. The NPS planning team did not take any "short-cut" in the planning process. We have, and will continue to follow the Council of Environmental Quality guidelines for the preparation of an Environmental Impact Statement. Early in project scoping it was determined that a full EIS instead of an Environmental Assessment would be done for the project.

5. Besides the considerable public input received during the course of the planning process, both at public workshops and scoping meetings, and via extensive written comment, the input and concerns of the public have been actively solicited. In addition, the NPS planning team made extensive use of survey and other information provided by competent studies about Oregon Caves conducted through Oregon State University in 1996 and the economic analysis of the tourism sector within the Illinois Valley that was conducted by Michael Wetter and Associates (1994 *Illinois Valley Tourism Assessment*, Final Report June 30, 1994, Salem, Oregon, Sponsored by the Oregon Economic Development Department, Rural Development Initiatives, Inc. and the Illinois Valley Community, Salem, Oregon.)

6. The issue of feasibility does not require the concession operation to necessarily be financially feasible to the Estey corporation specifically, but instead financially feasible and the opportunity to make a reasonable profit as

There is an issue paper attached (enclosure 3) which deals with the monetary losses the NPS preferred alternative would have on the local area. The draft GMP failed to consider the reduction in tourist revenue, the loss of Oregon Caves Company promotion dollars, the Oregon Caves Company support to youth and the community, the loss of substantial property tax dollars to county services and schools, jobs lost to local residents ranging from entry level to management positions, reduction in income taxes paid to Oregon State, reduction in income taxes paid to the U.S. Government, reduction or elimination of cash and non-cash franchise fees which have averaged $80,000 annually, spending millions in taxpayer dollars in unneeded capital housing projects and an operating budget subsidy, etc. The draft GMP fails to take into consideration any of the above effects the preferred alternative will have on the area.

6 The draft GMP fails to analyze the concession operation to determine on what basis services can be continued without the cave tours and to have a reasonable opportunity for the concessionaire to make a profit. The draft GMP fails to determine concession manpower needs and living accommodations needed for the concessionaire. Glen Baker, concession specialist from the Regional office, told me at the recent open house that he had informed the planning committee that the concession would not be profitable if the tours were taken away. Glen told me that the committee working on the draft did not want to address this issue.

7 The draft GMP not only failed to address manpower and living accommodations needed by the concessionaire, but the draft failed to address providing housing in the guide dormitory. The reason for mentioning this involves the assumption under the preferred alternative that this dormitory would become a coed dormitory. This dormitory is not designed currently for a coed dormitory unless NPS is supporting using coed sleeping areas, rest rooms and shower facilities. It also needs to be noted that one of the key NPS participants in influencing the draft GMP has never been to or in this dormitory, but sees fit to make decisions about the use of this building.

The draft GMP document and process to date does not meet reasonable real life professional standards. The document is NPS self-serving and does a disservice to the people in this region.

Respectfully yours,

THE ESTEY CORPORATION

Dick Gordon, Vice President
Recreational Property Group
The Estey Corporation

Enclosures (3)
cc: John Reynolds, Regional Director
National Park Service
ORCA3

[redacted]

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a viable business operation for any prospective concession under a competitive bid situation. Recent data from the NPS San Francisco-based concession office shows that a Chateau-based concession operation involving lodging, food service and gift sales has the capability of profitability without the inclusion of cave tours as a part of a future concession contract. One of the fundamental assumptions of this analysis, that is based on the hours and seasons of operation proposed in the plan, is that the range of concession lodging and food service operations would not be required during the slowest visitor use season (winter months), therefore positively contributing to the opportunity for profitability.

7. Most of the comments received from your company emphasize that concession operators rely heavily on local hiring. If carried out, this emphasis should reduce the need for on site housing. Since NPS also anticipates active hiring from the local community, it is likely that some space would be available in the Chalet for concession employees. Renovation and repairs of the guide house that are a result of deferred maintenance will be required in any scenario. Such repairs would be included as an element of a concession contract.

COMMENTS

I. V. TOURISM CONSULTING COMMITTEE
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RECEIVED
MAR 0 5 1998
OREGON CAVES
NATIONAL MONUMENT

March 1, 1998

Craig W. Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Superintendent:

In reviewing your proposition of the Draft Oregon Caves National Monument General Management Plan and Environmental Impact Statement December 1997, I feel you must be commended for a well done but highly technical presentation of your draft.

The volume of and manner in which the information is presented goes over the head of the average citizen. It would be more helpful if this information were condensed and simplified.

As to the proposition of your draft action alternatives ABC&D, there is no doubt that each has some merit.

However, looking at it from the business and tourism point of view, I would extract merits of each category and create new alternatives which will accent more in helping the local economy while at the same time protect the environment. This country of ours is built upon entrepreneurship as you know and our government should be more supportive in helping its development rather than restricting it.

1 I am in favor of the concession management as it provides more non-restrictive employment and promotes tourism. On the other hand, the National Parks Service requires a specific class of employee plus it does not actively promote tourism. Next, I feel there should be more loosening up of regulations concerning events and their dates. As indicated on page 93 the highest attendance of visitors to the caves is during July and August. This indicates to me that middle age families visit in this time frame. Your proposition of closing the caves tours during December, January and February deprives

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RESPONSES

Letter 20: Illinois Valley Tourism Consulting Committee

1. The proposal to suspend cave tours during the winter season is based on resource protection and cost efficiency considerations. It has been determined that natural cave organisms, having evolved in total darkness, benefit from periods in which people and lights are absent from the cave. During the construction project to replace the cave trail and lighting system, portions of the cave were closed to visitation for a period of several months during the winter. Initial indicators have supported the theory that bats are less likely to utilize certain portions of the cave while tours travel through that section and lighting is on; even intermittently. During the closures, a variety of bat species were documented inhabiting portions of the cave in which they had previously been unobserved, or observed in very small numbers.

   Scheduling no tours during winter months would not likely result in a reduction of 6,000 visitors to the Monument. Due to construction in various parts of the cave, tours have not been operating during winter months for the past few years. When tours did operate, visitation during the months of January and February was the lowest at any time of the year. In January of 1995 and February of 1994, the last dates for which cave tours were operated during those months, the number of persons taking paid cave tours was 307 and 645 respectively. Even with increased visitation around the holidays, tour numbers in December of 1994 totaled only 853. The General Management Plan allows the NPS flexibility in scheduling tours around peak periods, such as winter holidays should there be a determination that there is adequate need to serve visitors without diminishing protection of cave resources.

   Additionally, the NPS or a private operator must consider cost factors in relation to benefits to visitors when deciding to continue to provide services during periods of traditionally low visitation. Additional costs of snow removal from roads and trails and other incidental operating factors must be considered in relation to relatively low visitation rates.

COMMENTS

1 out of season tourists which select less crowded time for their visitation of the opportunity to visit. As indicated we would lose over 6,000 visitors which our valley can ill afford.

A mini-tour bus from the I.V. Visitor Center to the Oregon Caves would relieve congestion both on the highway and caves parking. During the mini-bus trip to the caves monument history could be imparted to the passengers.

National Monument infrastructure should work more closely with the community where monument is located to help meet its' needs.

2 One way to do this would be if in your proposed budget you might allocate some funding for an addition to the I.V. Visitor Center in the form of a heritage room where community crafts people can demonstrate vanishing arts and crafts. This would be less costly than building a new visitor center at a different location and duplicate services. The addition to the existing center would also be far more productive to our cultural resources and greatly enhance visitor service.

Renovating some distant existing facility is not practical for any of us.

I do agree to acquire more acreage for watershed protection, its' improvement will bring enjoyment for future generations.

19 As a businessman dealing with a large number of tourists I hear many comments concerning caves tours.

3 Last year we had a group of European tourists which didn't like the new tunnel the National Parks Service made. It reminded them of man made mine corridors. They were quite disappointed as they were expecting all natural caves.

Excessive draft in this corridor has an influence on the bat population, I believe.

This is a summation of observations concerning your draft.

I have discussed the above points with the I.V. Tourism Consulting Committee. They agree with these points as a group.

We hope that this will help you in the decision of appropriate action.

Yours very truly,

M. "Les" Lesiecki
for the I.V. Tourism Consulting Committee

RESPONSES

2. The NPS operates as a partner with other federal and local agencies in the operation of the Illinois Valley Visitor Information Center. Its original intent and charter is to provide comprehensive information on recreational resources and public lands in the area. Proposals for significant changes to the mission or operations of the center would be considered by the IVVC partners with concurrence by the Superintendent of the Monument. A heritage room for community crafts could be considered for the center but is currently outside the scope of the intended purposes of that facility. The proposed visitor center at the Monument would serve a completely different purpose than the IVVC. Specific on-site orientation for cave tours, interpretive exhibits and displays, and in depth interpretive programming would be provided at the Monument center. Provision of an on-site visitors center is a need identified by a large majority of Monument visitors.

3. There have been no new tunnels or any new man-made passages created as a result of the cave trail rehabilitation or cave restoration projects. The existing Connecting Tunnel and Exit Tunnel were constructed in the 1930s.

Southern Oregon
VISITORS ASSOCIATION

March 13, 1998

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Superintendent:

The Southern Oregon Visitors Association (SOVA), which represents more than 150 tourism related businesses in six southern Oregon counties, has built a strong and successful relationship with the concessionaires who currently operate the Oregon Caves National Monument. In fact, their strong operation and marketing efforts have been very important to SOVA's success.

Without further review, we want to express our concern about any Alternative that reduces the number of people that could visit the Cave, increases direct costs to tax payers, and does not address marketing issues. SOVA believes that any significant change in operations that result in fewer visitors or marketing would result in a reduction of several million dollars annually to our regional tourism economy. Therefore, any alternative that increases costs to taxpayers and reduces visitation does not appear to be in the best interest of our region, our members or taxpayers.

We urge you to select an alternative that recognizes that the current concessionaire has done a superior job in marketing and managing this valuable national resource.

Sincerely,

Marilee Weber

Marilee Weber
SOVA Executive Secretary
For the SOVA Board of Directors

Sandra Slattery, Ashland Chamber/VCB, Patti Bills, Medford VCB, Mary Carrieri, Rogue Regency Inn, David Day, Eagle Point Golf Course, Kerrie Walters, Riverside Inn, Robert Hamlyn, Hellgate Jetboats, Charlie Mitchell, City of Grants Pass, Linda Beauchamp, Grants pass VCB, Billie LeSeuer, Pat McMillan, Klamath County Dept. Tourism, Ilene Bradner, Super 8 Motels, Jean Kurtz, Roseburg VCB, Jim McClellan, Mayor of Winston, Barbara Gershon, City of Roseburg, Missy Olson, Wildlife Safari, Jerry Biewend, Four Seasons RV Resort, Barbara Schulz, Sand'n Sea Motel, Bill Ferry, Pelican Bay Publishing, Inc., Brent Siebold, Valley of the Rogue State Park, Kathi Joy, Bay Area Chamber of Commerce

Phone: (541) 779-4691 • **Fax:** (541) 779-0953 • **E-Mail:** office@sova.org • **Website:** www.sova.org
Business Address: 332 West Sixth Street, Medford, Oregon • **Mailing Address:** P.O. Box 1643, Medford, Oregon 97501-0731

SOVA is a regional professional trade association which serves the southern Oregon visitor industry through research, education, legislative advocacy and outreach marketing in order to promote a balanced and healthy economic life for the people of southern Oregon.

Letter 21: Southern Oregon Visitors Association

Please see NPS responses to Letter 20.

L-510

Grants Pass
Towne Center
Association

TOWNE CENTER

Post Office Box 555, Grants Pass, Oregon 97526 • (503) 476-5779

March 9, 1998

RECEIVED
MAR 14 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman
Oregon Caves National Monument
19000 Caves Hwy.
Cave Junction, OR. 97523

Dear Mr. Ackerman:

The Grants Pass Towne Center Association Board of Directors has voted unanimously to support the Oregon Caves Company and private concession arrangement that has existed for the last twenty years.

Many visitors pass through and stop in downtown Grants Pass on their way to the Oregon Caves. Most are excited about the prospects of taking the tour and enjoying the unique opportunity which the Oregon Caves offer. We have never heard anyone indicate they were disappointed with the tour or the services offered. Most feel it was an enriching experience.

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The Oregon Caves is important to our economy in a variety of ways. It provides jobs, pays local taxes, supports our downtown merchants, and brings thousands of visitors every year. The Oregon Caves Company vigorously promotes tourism which brings people to the area; with other local promotions we can extend their visit. Tourism is a valid, profitable and clean industry.

These are among the many reasons we support the Oregon Caves Company. We believe a private company will continue to be more efficient and a better use of taxpayer dollars. If it ain't broke, let's not try to "fix" it.

Thank you for giving us the opportunity to express our concerns, and your attention to them.

Respectfully,

Ward Warren

Ward Warren
President

cc: State Representative Carl Wilson
United States Representative Robert F. Smith
Josephine County Board of Commissioners
Grants Pass Visitors and Convention Center
Charlie Mitchell City of Grants Pass
Oregon Caves Company

PO Box 555 • Phone: (541) 476-5779 • Fax: (541) 476-5779 • E-MAIL tcc@mind.com • WEB www.grantspass.com/tcc

Letter 22: Grants Pass Towne Center Association

Thank you for your comments. Please see NPS responses to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

THE WILDERNESS SOCIETY

PACIFIC NORTHWEST REGION

RECEIVED
MAR 02 1998
OREGON CAVES
NATIONAL MONUMENT

February 25, 1998

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Re: Draft General Management Plan and DEIS

Dear Superintendent Ackerman:

We are pleased to submit the following comments on the Draft General Management Plan and Environmental Impact Statement for Oregon Caves National Monument. We request that you place them in the formal administrative record.

General Observations

At the outset, we would like to express our appreciation for the thoroughness of the document. You have responded to the legal obligations governing management of the national park system with an uncommon candor, determination and clarity. These legal obligations, including the Act of August 25, 1916 as amended, the General Authorities Act of 1970, the National Parks and Recreation Act of 1978, and others described in the draft, clearly distinguish the National Park Service and its mission from all other federal agencies. No doubt your bold defense of this mission in the text, analysis, and recommendations of the GMP may offend those who see the world in a more utilitarian light. This is predictable, and should not be cause for concern. The standards you have set in your preferred Alternative C are the minimum necessary to meet the requirements of applicable environmental law and policy. Moreover, a majority of the American people are on your side.

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Letter 23: The Wilderness Society

1. See preceding Responses to General Comments, item 5. The document presents a reasonable range of alternatives to consider. The alternatives for the Monument boundary range from the No Action to the addition of 3,410 acres to the Monument to insure a protected water supply, and to provide enhanced outdoor recreational opportunity; from no concession services to retention of existing services; from no on-site visitor center to a new on-site center with cooperating association area for sale of educational materials; from retaining existing concession cave guides to park ranger or private non-profit association cave guides.

2. The NPS did consider other Monument boundary alternatives which would have taken in more of the middleground views. The primary reason for boundary change was to insure the long-term protection of the cave ecology and the public water supply. Viewshed protection was also an important consideration in the plan in order to insure the long-term protection of scenic quality for Monument visitors. However, since all of the foreground viewshed in Level I sensitivity is protected, and much of the middleground viewshed (62% of Level I sensitivity) is protected by the proposal, it was determined unnecessary to propose a boundary change beyond the area included in the proposal. Also, as the USFS manages much of the surrounding lands under the *Northwest Forest Plan* as Late Successional Reserve toward old-growth characteristics, more and more of the middleground viewshed as seen from the Monument should be protected in the coming years.

3. Some consideration was given to the suggestion of an NPS administered Oregon Caves Parkway. However much of the lower section of Oregon Highway 46 or what is known as the Caves Highway between Cave Junction and the Monument is in private ownership and is under the legal jurisdiction of Josephine County. A proposal to bring roadside areas under some sort of federal jurisdiction would not be practical or feasible given the large extent of privately owned land. Accordingly, the plan does encourage both Josephine County and the City of Cave Junction to carefully consider land use actions along the Caves Highway to assist in retaining and enhancing the quality of the scenery and the visitor experience for the traveling public along the highway between Cave Junction and the Monument. The upper areas along the Caves Highway starting just prior to Grayback Creek Campground are within the Siskiyou National Forest and could be given some consideration for

Context: An Essential Ingredient

Two components of the Draft GMP deserve special commendation. First is the effort to place the small 480 acre monument in a larger ecoregional and socio-economic context. The Klamath-Siskiyou Ecoregion is without a doubt one of the most ecologically significant landscapes in North America. Astoundingly, but for the Oregon Caves National Monument, the ecoregion, or "natural theme" in NPS lexicon, is virtually unrepresented in the national park system. Further, the region is undergoing profound socio-economic change. It is essential for reviewers of the GMP to understand this larger context if they are to comment intelligently on the recommendations contained in the document.

Second, you are to be commended for providing narrative and graphics depicting the **political context and history of land use** in the region, especially in those areas proximate to the Monument boundary. As noted in the document, the NPS is charged by law and policy to review the adequacy of the Monument boundary during development of the GMP. In so doing, you correctly determined that such review must be based, in part, on the political context within which you plan, as well as past and present management of surrounding lands.

In this regard, it is appropriate to mention in the draft the political controversies over logging in the area. These controversies were not of your doing, but the story they tell is not only relevant, it is an essential element of the affected environment. Had you omitted discussion of it, the National Park Service would have been exposed to challenge on the basis that relevant information had been ignored in the development of the GMP and EIS. You are to be congratulated for including it.

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Boundary Proposal Lacks Vision

Unfortunately, as we move to the specifics of the plan, we must be less complementary. This is especially true with regard to the insufficient boundary modification proposed as a component of Alternative C. Certainly, the modest addition of 3,310 acres is necessary to ensure conservation of the primary cave resource and to ensure the health and safety of potable water supplies. Indeed, it is very likely the bare minimum required. On this point, you have provided ample documentation, both in the body of the document and in the excellent appended analysis at page 197.

In this regard, we should note our belief that the boundary option described in Alternative B would be an insufficient response to the issues presented. A Memorandum of Understanding (MOU) with the Forest Service would unnecessarily perpetuate management conflicts among the agencies and risks to the monument's resources and operations. Furthermore, we find it unlikely that the Forest Service would agree to manage the so-called "Protected Area" to the required high National Park Service standards. They certainly have not done so to date, and current Northwest Forest Plan guidelines pertaining to management of Late-successional Reserves do not meet NPS standards. It would be far better to take the necessary step of amending the Monument boundary once and for all. Nothing in the Northwest Forest Plan precludes an expansion of a Congressionally Reserved Area, and there is ample justification to do so in this case.

a parkway designation.

Given these factors, it was felt that the designation of a parkway by the NPS would not be feasible. However, full consideration should be given to the establishment of Caves Highway as a National Scenic Byway. This designation would draw together Josephine County, the City of Cave Junction, the USFS and the NPS in partnership with each other in the long-term management of the Caves Highway for the retention of its scenic values for the traveling public without changing any jurisdictional authority or the private ownership of land along the route. This recommendation will be added to the final GMP/EIS text.

4. The NPS will continue to work with the Siskiyou National Forest and others to pursue opportunities for the identification of ecological linkages and cooperative measures to enhance wildlife habitat and protection.

5. We concur that the vast majority of visitor services to Monument visitors should occur in the gateway community of Cave Junction, and we support these businesses through our involvement with the Illinois Valley Chamber of Commerce. However, the decision to retain lodging, food service and gift sales at the Monument was done more to help ensure the long-term preservation of a National Historic Landmark property. The Chateau was originally built as a hotel, and the plan (Alternative C) proposes to continue this historic use. Private sector concession use of the Chateau property will also lower public expenditures for the upkeep and maintenance of the building. Finally, the NPS will utilize the existing historic Chalet structure, which will provide space for an important visitor center function along with needed employee housing at the Monument without having to construct additional new facilities for this purpose on-site.

6. An alternative was considered which would add to the boundary and eliminate concession services. However, given the importance of protecting the historic Chateau, it was determined that concession services in the Chateau were very much in keeping with the preservation emphasis of the proposed action and that another distinct alternative was not needed.

1 Despite our objection to the MOU concept in Alternative B, it does not automatically follow that we support the boundary proposal in Alternative C. In fact, we believe Alternative C is a weak response to the issues presented, and that the document presents an insufficient range of alternatives.

Viewshed Protection Inadequate

We note on page 110 of the plan, the reported findings of the ***Grayback/Sucker Pilot Watershed Analysis*** team noting that the Monument's viewshed is in a heavily altered condition and does not meet the Siskiyou National Forest Land and Resource Management Plan guidelines. They further noted that ". . . future timber harvest will likely impact the surrounding scenery of the Monument," and that priority should be placed on trying to meet visual guidelines within the "... Oregon Caves Viewshed, and along Caves Highway and Grayback Road." These official government findings square solidly with the experience of our staff when visiting Oregon Caves and hiking its trail system.

Unfortunately, despite a rigorous GIS-based visual analysis from key viewpoints, the National Park Service boundary recommendation in Alternative C would incorporate into the Monument too little of the viewshed. Specifically, only 62% of the Level I (highest) Sensitivity middle ground views would be included, 67% of the Level II Sensitivity foreground views, and just 37% of the Level II Sensitivity middle ground views. It is clear to us that the 3,310 acre boundary proposal does not sufficiently respond to the need to protect the viewshed of Oregon Caves National Monument. We would favor consideration of an alternative that protects a substantially larger percentage of the foreground and middle ground views.

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Oregon Caves Parkway Proposed

After reviewing the recommendations of the analysis team referenced above regarding degraded views along Caves Highway, together with the descriptions of the Illinois Valley Visitor Center (IVVC), and the assessment of the ***Oregon Caves Highway Visitor Experience*** in Figure 19, we fully expected tangible NPS recommendations regarding management of the Caves Highway road corridor and surrounding landscape. No such recommendations are presented in the draft. It is clear from the plan that the visitor experience begins at the IVVC, and culminates with the cave tour or a hike through the old growth forest within the Monument. Yet, the plan appears to lack any substantive vision or recommendations regarding the visitor experience along the intervening 22 miles.

3 We recommend consideration of a National Park Service administered Oregon Caves Parkway, not unlike the Blue Ridge Parkway in the Southeast, or any number of similar NPS scenic roadways. The Oregon Caves Parkway could have as objectives, 1) restoration and protection of the viewshed seen from the roadway, 2) substantially enhanced interpretation of the natural and cultural resources of the area, and if appropriate, 3) additional recreational opportunities and visitor facilities. Such a parkway would broaden the visitor experience substantially and may encourage longer visitor stays with a corresponding higher level of local

3 economic activity. Importantly, it also could have the added ecological benefit of establishing a linear corridor of protected land to provide a more solid biological link between Oregon Caves National Monument and lower elevation lands in the Illinois Valley.

Corridors of Protection Needed

As noted above, the Draft GMP and DEIS does an excellent job of setting the National Monument in a larger ecoregional context. That is, the plan clearly describes the Monument as part of a larger whole, linked ecologically across the landscape. Unfortunately, the document does not follow this observation with any substantive findings regarding how the National Park Service intends to ensure these links are maintained over time. Based on the history of land use in the area, especially the extensive logging and road building, it is appropriate for the NPS to be concerned about the Monument becoming a natural island in a utilitarian landscape.

4 We believe the National Park Service should, in cooperation with the US Forest Service and other interested parties, identify significant wildland areas within the Greater Siskiyou Ecoregion, and set as an objective the preservation of ecological linkages between the Monument and those areas. This need not mean the Park Service will administer all of these lands, only that they be managed compatibly with resource protection as the highest and best use. The alternative of allowing the Monument to be biologically severed from surrounding wildlands is simply unacceptable. The National Park Service should state in this GMP what steps are needed to ensure strong ecological links between Oregon Caves National Monument and key lands in the surrounding landscape.

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Concession Operations Not Necessary and Appropriate

We were quite pleased to note, in Alternative B, that all overnight visitor accommodations would be eliminated. Such a recommendation is fully consistent with nearly every formal or informal National Park Service policy statement on the subject in recent years. Just one example is the official *Report and Recommendations to the Director of the National Park Service*, otherwise known as "The Vail Agenda." In this document, the working group on park use and enjoyment recommended that the National Park Service ***"... encourage the development of private sector visitor services in the gateway communities, so as to contribute to local economic development, encourage competition, increase choices for visitors and minimize the need for in-park facilities."*** We fully support this recommendation and believe it should be followed at Oregon Caves National Monument.

5

6 Unfortunately, this recommendation to phase out concessioner provided lodging did not carry over to the preferred Alternative C. Hence, if the reviewer wishes to support the phase-out of overnight services, their only choice is Alternative B – an unacceptable choice for other reasons – including the absence of a boundary modification. This, of course, is a false choice and must be remedied in the final. Please present an alternative that both eliminates concessioner provided overnight services and modifies the boundary.

We appreciate this opportunity to comment on the Draft General Management Plan and DEIS for Oregon Caves National Monument. The document sets a new standard for presentation and thoroughness. We consider the Preferred Alternative C to be the minimum necessary to meet applicable law and policy. We believe the National Park Service is capable of articulating a range of alternatives with substantially more breadth and vision. We encourage you to do so.

Thank you.

Sincerely,

Steven Whitney
Director, Pacific Northwest Region

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National Parks
and Conservation Association

PACIFIC REGIONAL OFFICE

13 March 1998

RECEIVED
MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman
Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

RE: OREGON CAVES NATIONAL MONUMENT DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Craig:

The National Parks and Conservation Association (NPCA) is America's only private nonprofit citizen's organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System. NPCA was founded in 1919 and currently has nearly 500,000 members. Thank you for this opportunity to provide comments on the General Management Plan (GMP) for Oregon Caves National Monument (ORCA). Oregon Caves is a tremendously rich national park unit of "unusual scientific interest and importance" as deemed by President Taft in 1909. Furthermore, as the NPS 1995 Statement of Significance asserts, "...its old growth forest structure, elevation effects and cave zonation, contribute even greater significance." Increased scientific awareness and recent discoveries indicate that these park values merit close analysis and protection. As a result, we are pleased to see that NPS has carefully crafted the Draft ORCA GMP. It clearly delineates park management alternatives and provides useful information on the monument's historical and regional context.

NPCA supports actions which will best provide for the long-term protection of the park's resources. For this reason, we support most of the components of alternative C. It proposes increased protection for the park's resources through a boundary expansion. It also develops a strategy by which the park could establish a more effective NPS presence by managing cave interpretation and expanding interpretive facilities. This alternative also will allow the monument to serve as a place of study and application of cave and forest restoration techniques. However, we think this management alternative should be improved with a larger boundary expansion and a possible reduction in concession services.

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National Office
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Letter 24: National Parks and Conservation Association

1. Yes, the proposed Monument expansion also will resolve many unclear land use and resources management issues created by the 1907 Secretary of the Interior Executive Order, which withdrew the four square sections comprising approximately 2,560 acres, "for a proposed national monument." Interestingly, this early withdrawal was recommended by the Acting Secretary of Agriculture. Unlike the 1907 four sections withdrawal, the current Monument boundary proposal is drawn to be more reflective of viewshed values and the natural resources defined by natural hydrographic and topographic boundaries.

   With respect to the original 1906 withdrawal area, the legislation to be proposed by NPS for an adjustment of the existing boundary of the Monument would include a provision that the original rectangular 2560 acre withdrawal be canceled. Therefore, any lands within the original 2560 acres but outside the proposed hydrographic Monument boundary would be released for exclusive uses under the dominant policies and regulations of the USFS and the *Northwest Forest Plan*. The analysis of the preferred boundary proposal concluded that retention of the withdrawal on those original lands was not applicable for protection of Monument resources or the potential primary viewsheds and would continue to create confusion as to the appropriate land and resources administration priorities.

2. Additional information has been provided in the final document to better delineate the breakdown of development costs. It should be noted that development plans for employee housing and replacement of storm damaged administrative facilities were already well underway at the onset of the general management plan process. Those projects and their associated cost estimates (of $698,800 and $750,000 respectively) account for $1,448,800 or 34% of the proposal's total projected cost. By including the projects in the GMP process, improved coordination and comprehensiveness of the document was achieved. This allowed the NPS to complete compliance requirements in an efficient manner.

COMMENTS

National Parks and Conservation Association

Since the establishment of the monument, science has provided insight into the interconnectedness of the cave with its surrounding environment, including the Siskiyou Forest. For example, the bats in the region depend both on the cave and the surrounding old-growth forests. Changes in the surrounding forest ecology can negatively impact the cave's ecology. Additionally, it is clear that the unit also plays an important role in preserving, as noted in the Statement of Significance, "...an excellent example of the Klamath/Siskiyou Mountain range's primeval forest; a bio-region with one of the highest concentrations of endemic plants in the nation as well as the world's most diverse coniferous forest." The Statement continues, "...the forests are a small remnant of that which once covered much of the Pacific Northwest. The cultural and ecological value of these remnant forests increase as the range diminishes " As the plan envisions greater protections for these resources, the park should consider the possibility of expanding the scope of the park purpose to include protection of a part of the jeopardized Siskiyou Forest. This will provide leverage for management actions that will better protect all of this unit's nationally significant resources and provide for an enriched and extended visitor experience. Please see the following for our more specific comments.

Boundary Expansion:

For at least the past 60 years, a boundary expansion has been under discussion in order to better protect the cave, the surrounding watershed and a remnant of the botanical riches of the Siskiyou Forest. We commend the NPS for its initiative in using this GMP process as an opportunity to implement a boundary expansion. Revising the park boundary to better reflect the area's watershed is an important move to ensure that the cave's hydrology, the park's viewshed and its water supply are all afforded protection. This action also promotes the intent of the Redwood Act of 1978 where "the protection, management, and administration of the areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established." Unfortunately, substantial degradation of the surrounding area has occurred since expansion was originally proposed. This underscores the need to bring the surrounding lands under NPS management to ensure that its management is consistent with park protection standards. The NPS should acquire enough land to ensure protection of the monument's resources and continue to work cooperatively with the Forest Service in negotiating management of surrounding lands.

However, as we implied earlier, NPS should develop an alternative that presents a larger boundary expansion to increase protection of the cave and surrounding forest. Additionally, such an expansion would provide greater protection for the viewshed. The document notes that only 62% of Level 1 Sensitivity middle ground, 67% of Level 2 Sensitivity foreground and 37% of Level 2 Sensitivity middle ground views would be included in the current boundary expansion. Furthermore, it is anticipated that "future timber harvest will likely impact the surrounding scenery of the Monument."(p. 110) Clearly, an expansion that encompasses and protect more of the monument's viewshed is merited.

This boundary revision should encompass the land south of the monument to take in the logging road south of the park and better protect and showcase the viewshed opportunity on Mt. Elijah.

RESPONSES

3. Elimination of concession services was considered in one of the alternatives not selected. While there is some merit to the argument that duplicate services can be and are provided in the local communities, it was determined that there is an overall benefit to the Monument, the public and the local communities to continue providing food service and lodging at the Chateau. Public responses during the review process generally supported this use. One reason is that these are appropriate uses of that historic facility; and, uses for which the facility was originally designed. Discussions with cultural resources specialists indicated that preservation of the Chateau is in some ways better served by continuing its original intended use. Permitting a concessioner continued use of the facility also reduces maintenance and restoration costs to NPS. A historic building maintenance and preservation plan will be developed by NPS and provided to a concessioner as a term of continued operation of the facility. The proposal does limit concession services through a relocation and reduction in size of the gift shop facility; addition to future prospectuses of a gift shop mission statement requirement that requires emphasis on educational and interpretive themes; and, reduction in the overall season of operation of the facilities.

4. The daily target capacity of 700 persons is derived from the proposed reduction in peak season cave tours from the current maximum limit of 16 persons every six minutes for 11 hours (16 x 10 x 11= 1760) to a limit of 15 persons every 15 minutes for 10 hours (15 x 4 x 10 = 600.) To the general schedule limit of 600, approximately 100 additional persons per day were added to provide for some flexibility in scheduling to accommodate visitors needs; but, equally important for development of other than general tours such as environmental education, special historical, scientific or children's tours that would be closely supervised by NPS staff. The number 700 is not meant to be an absolute, but rather a target upon which NPS can monitor use and cave resources to determine if additional adjustments are necessary to provide the best balance of visitor enjoyment and resource protection. NPS intends to explore a variety of tours of shorter and longer length, as well as specialty opportunities such as wild cave experiences to meet the needs of visitors while providing the highest level of protection possible to the cave.

This additional expansion would also provide a buffer zone from future logging, grazing, mining, and noxious weed introduction. This would also lead to improvements in soil and riparian characteristics at upper and lower elevations, accelerate new growth and thereby prevent soil loading in Limestone Creek.

1 One issue that remains unclear in this document is the implication of the 1906 boundary withdrawal and the status of those lands in light of the fact that the original withdrawal for the purposes of establishing the monument included 2,560 acres. As this area is still considered to be withdrawn for the establishment of the monument, and as that area overlaps with the proposed expansion, is the historic intent to transfer the land to NPS management to better protect its resources?

Development Costs:

2 More information would be useful in this section. For example, there should be a breakdown of the allocation of the funds necessary for development. How much of $4,255,000 goes towards park housing for example? In light of recent controversies surrounding NPS construction projects, it is important to disclose that type of information to head off any public misunderstanding. Also, the document states that "the adequacy of the water and sewage treatment systems at the monument for employee and visitor use (both quantity and quality) would be investigated for possible future increases in use."(p.38) These issues should be assessed sooner rather than later and figured into a phased prioritization for development, as it is not likely that the needed funding for plan implementation will be readily available.

Concession Services and Facilities:

3 To better manage concession services, we support NPS acquisition of possessory interest. According to the Concessions Policy Act of 1965, concessions are to be permitted if they provide "necessary and appropriate" services to meet basic visitor needs. However, what was appropriate at one time may not be appropriate at another. For example, early in the monument's history, overnight accommodations were appropriate when a day was required to visit the monument. However, that is no longer the case as a visit can now be completed in 2 or 3 hours. When determining what concession services should remain, it should be based on an analysis of current visitor needs and identify what could be provided by gateway communities and thereby contribute to local economic development. We are not clear why overnight accommodations were eliminated in alternative B, but did not carry that over to the preferred alternative. As noted earlier, we would prefer the document to consider additional reductions in concession services as part of a management alternative package. If concession services are reduced, it will free up additional building space that could be used by NPS and/or leased to a non-profit organization or educational institute that could use the cave and surrounding area for research and education.

Since 1990, we have dramatically increased scientific research into the cave system's hydrology, inhabitants and natural processes. However, the current state of baseline data does not lend itself to making specific recommendations on a precise daily limit of cave tours or visitors that would "minimize" impacts on the cave. Virtually any incursion into the cave creates human impacts. Information gathered from Oregon Caves, other National Park Service caves, and caves outside the system indicate that reducing hours of illumination, frequency of tours, and overall numbers of visitors in the cave will reduce overall, human caused impacts. In absence of specific data it is incumbent on the NPS to err on the side of protection. We feel that the proposed levels of visitation, along with better control and supervision of tours will better protect cave resources while preserving a balance with making the cave available for visitor to enjoy.

5. Recreational horse use of areas that would be added to the Monument can and should be continued on non-motorized trails designated appropriate for that use. The NPS staff will be working cooperatively with horse user groups in that regard. However, given the importance of protecting the public water supply and the sensitive riparian areas in and around Bigelow Lakes, it was determined that cattle grazing would be inappropriate in the expanded Monument. Monument staff is coordinating with the Applegate District of the Rogue River National Forest on this issue, and grazing is not expected to be permitted in the upper Lake Creek watershed in the future (see NPS responses to Letter 52). Finally, hunting is an inappropriate activity in a national monument and this use would be excluded from the expanded boundary.

6. Please see NPS response to The Wilderness Society, Letter 23 regarding development of Oregon Caves Highway Parkway.

Cave Tours:

As the plan discusses, it is entirely appropriate for NPS to interpret the primary resource of a park unit. The Organic Act charges the National Park Service to "...conserve the scenery and natural and historic objects...and to provide for the enjoyment of same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." This is applicable to park interpretation, which should both promote visitor enjoyment and resource protection. We do not mean to imply that NPS has the exclusive ability to provide this type of interpretation at the cave. However, NPCA would argue that NPS is the more appropriate agent for this, as they are directly responsible to the Organic Act. A private concession, on the other hand, is additionally responsible to a profit margin which may promote actions incompatible with resource protection.

On principle, we also find it inappropriate for NPS to pay for cave maintenance, restoration and research while the concession operator enjoys a profit in part at the expense of this taxpayer-funded upkeep. In a sense, the taxpayer is paying twice - in government taxes and through the concession's entrance fee, and the revenue from the latter goes to the concessioner rather than to the park.

4 There are several other aspects to cave management in the preferred alternative that we support. The management of reservations and ticket sales at the Illinois Valley Visitor Center will allow visitors to plan ahead, avoid lengthy waits and possibly linger in Cave Junction, yielding more economic benefits to the community. We support reductions in tour group sizes and frequency and seasonal closures for research, protection and restoration of cave resources, including bat populations. However, absent substantial research of human impacts on cave resources, and based on the fact that the cave currently shows signs of degradation from human actions, the proposed visitation level of 700 visitors a day seems high. We would like to better understand how this carrying capacity was established.

Visitation Trends:

In planning for future visitation the park should anticipate shifts in visitation patterns, including the fact that the length of visits to the monument may become longer, as there will be increased national park interpretation and additional attractions such as Bigelow Lakes and hiking trails.

Bigelow Lakes:

We strongly support the inclusion of Bigelow Lakes. This is important for watershed protection and to counter potential degradation to the public water supply from incompatible uses such as grazing. Additionally, Bigelow Lakes has its own intrinsic qualities worth protecting including the only aspen forest found in Siskiyou Forest. The area also contains the greatest concentration and variety of plants in a non-serpentine community in the Siskiyou Forest.

Historical Uses:

5 We understand the local community has enjoyed a variety of uses in the area, including stock use and hunting. While we appreciate the local support for continuation of these activities, it is important that NPS make decisions based on what is appropriate for protection of park resources. Therefore, in making these determinations, NPS needs to study impacts from historic uses and apply appropriate restrictions to ensure that park resources are protected.

Parkway Idea:

6 We support consideration of The Wilderness Society's proposal for a parkway. This would enhance protection for the roadside viewshed, expand interpretive and possibly recreational opportunities for the area's natural and cultural resources and enrich the visitor experience. Ecologically, it could also provide an important biological corridor to link the monument with the lower elevation lands in the valley. In evaluating this possibility, consideration should be given to how it may affect the length of park visits and impact traffic flow on the road leading to the park.

73 Oregon Caves National Monument is a small unit with tremendous significance and potential. We applaud NPS efforts to develop a management strategy that enhances park protection. Thank you again for the opportunity to provide input into the planning process. Please do not hesitate to call with any questions or comments and please keep us updated on all future developments.

Sincerely,

Brian Huse
Director

L-569

the Northcoast Environmental Center

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MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

March 12, 1998

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction OR 97523

Oregon Caves General Management Plan
National Park Service
Columbia Cascades Support Office
909 First Ave., Suite 500
Seattle WA 98104--9882 FAX 206/220-4160

Gentlepersons:

Thank you for accepting our comments on the Draft General Management Plan and EIS for the Oregon Caves National Monument.

The Northcoast Environmental Center is a tax-exempt non-profit educational organization founded in 1971 and dedicated to illuminating the relationships between humankind and the biosphere. Towards that end, the Center provides environmental information and referral services for northwestern California and operates a library open to the public. The Center's some 4,500 members are largely located in northwestern California and southwestern Oregon, but some members are found in most states and in several foreign countries.

The Center works in cooperation with the Siskiyou Project, the Headwaters Environmental Center, the Citizens for Better Forestry, the Klamath Forest Alliance and the World Wildlife Fund to make up the Klamath~Siskiyou Alliance (K~SA see: enclosure), The Alliance is intent on helping to effect a credible science based conservation plan for the Klamath~Siskiyou Bioregion.

First, the Park Service has produced a remarkable GMP/EIS document containing detailed resource information, exceptional graphics, and, to quote Steve Whitney with the Wilderness Society, "uncommon candor." We expect to utilize the document as a key reference for years to come. If the NPS would *please be so kind as to share another copy* with us we would be able to put it in our general library.

879 NINTH STREET • ARCATA, CA 95521
(707) 822-6918 (KEEP TRYING)

Letter 25: Northcoast Environmental Center

Thank you for your comments.

We appreciate that the NPS has recognized that the overall area of the Oregon Caves National Monument is probably too small to adequately protect the unique attributes of the monument.

We also recognize that the 3,000 or so acre addition preferred by the NPS to expand the monument boundary is a big step for the Park Service. On the other hand we believe that the time has come to develop a much more ambitious alternative to secure the ecological integrity of the landscape context in which the Oregon Caves National Monument exists.

The Siskiyou National Forest is a distressed landscape where ancient forest dependent species are in serious decline. Terrestrial species like the northern spotted owl, red tree vole, fisher, wolverine, tailed frog, Del Norte salamander and others face a questionable future. Aquatic systems have undergone dramatic changes in historic times, threatening the extirpate suites of wild salmonids. And entire plant communities have been altered to the point of losing their unique attributes.

All of this has been accomplished in a relatively short period of time dedicated to clear cutting in the public domain to benefit a dominant economic use of the forest. This over the broader citizen interest in the public trust values that have been significantly impaired.

We believe that more expansive preservation proposals advocated by the Siskiyou Project have merit. We request that the NPS develop an alternative for serious consideration that would include all of the public lands in the Sucker Creek, Cave Creek and Grayback Creek watersheds. Sucker Creek is particularly important because of the pioneering ecological studies completed there in the 1950s by Dr. R.H. Whittaker.

Because of the widespread clear cutting and associated road building in Sucker Creek watershed, an opportunity exists to conduct ecological restoration research using Whittaker's baseline data to inform future studies,

It is reasonable, in our view, to suggest that public lands adjacent to the Oregon Caves National Monument should be protected for their higher ecological service functions, and to provide a living laboratory for advancing knowledge needed to inform adaptive management strategies for the larger forest landscape.

Thank you for your consideration of our comments, and for your commitment to provide the plans and management designed to protect and expand the Oregon Caves National Monument.

Please advise us of your final decision in this important matter, and please keep us informed of other opportunities to provide comment on management decisions pertaining to the Oregon Caves National Monument. Thank you again.

Sincerely yours,

Tim McKay, executive director

TM/me

76

Siskiyou Project
The Wilderness Society
Redwood Region Audubon Society
California Native Plant Society, Northcoast Chapter
Senator Mike Thompson
Congressman Frank Riggs
Senator Dianne Feinstein
Senator Barbara Boxer
Assemblywoman Virginia Strom-Martin
North Group, Redwood Chapter Sierra Club
Siskiyou National Forest

PRESERVE OUR FORESTS

Santa Cruz Rainforest Action Group

1601 Jarvis Road
Santa Cruz, CA 95065
(408) 459-6774

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MAR 18 1998
OREGON CAVES
NATIONAL MONUMENT

March 12, 1998

Oregon Caves General Management
National Park Service
Columbia Cascades Support Office
909 First Ave., Suite 500
Seattle, Washington, 98104-9882

Re: Support For Expansion of Oregon Caves National Monument.

Dear National Park Management Staff:

On behalf of the 150+ members of the Santa Cruz Rainforest Action Group, we are very pleased and extremely supportive of your efforts to expand the Oregon Caves National Monument. This area of the Siskiyou mountains contains ancient forests and an ecosystem which is highly diverse and visually stunning. **WE STRONGLY URGE YOU TO EXPAND THE MONUMENT TO INCLUDE 48,000 ACRES OF SURROUNDING ANCIENT FORESTS ON PUBLIC LAND.** The streams, and ancient forests surrounding the monument are in great danger and have already suffered tremendous damage from logging, and grazing. Unfortunately, the USFS has demonstrated a history of mismanagment of our public lands to the detriment of ancient forest, endangered species, and fisheries. Unless this surrounding land is permanently protected through acquisition by the park service, it will continue to be abused and will eventually lose most if not all of its ecological value.

77

You have before you a golden opportunity to protect this beautiful land for future generations. We live in a world of quickly vanishing wilderness lands. Our national forests are our nation's heritage, but unfortunately they are being liquidated to the highest bidder. This is your chance to stop this destruction and permanently protect this once pristine wilderness and the species that live there. Please do everything within your power to enlarge the monument to include the 48,000 acres, and leave a legacy that our children can be proud of. This is an incredible opportunity, please don't squander it. Thank you in advance for your efforts. We all look forward to visiting a new 48,000+ acre Oregon Caves National Monument. The Santa Cruz Rainforest Action Group, and all American's demand an end to the destruction of our public lands NOW and applaud the efforts of the National Parks Service (the only true stewards of the land) in their effort to expand this national treasure!

Respectfully Submitted

Steve Graves
Executive Director

Ray Newkirk
Assistant Director

cc: Forest Service Chief Mike Dombeck
Chief of the US Forest Service
201 14th & Independence Ave. SW
Washington, DC (202) 205-1661

Vice President Al Gore, OEOB, Rm. 274, Washington, D.C. 20501
Katie McGinty, Director of the Council on Environmental Quality, OEOB, Rm. 360, Washington, D.C. 20501.

Letter 26: Santa Cruz Rainforest Action Group

See language added at the end of the Alternatives chapter, under Alternatives Considered but Rejected section, item 7, Other Boundary Configuations.

Klamath Forest Alliance
P.O. Box 820, Etna, CA 96027
ph. 467-5450 fax 467-3130 email: Klamath@sisqtel.net

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

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MAR 12 1998
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NATIONAL MONUMENT

March 9, 1998

Dear Mr. Ackerman:

As a representative of the Klamath Forest Alliance, I am writing with regards to the Oregon Caves National Monument Draft Management Plan and Environmental Impact Statement. Please consider these comments and place them in the formal administrative record.

First, I would like to compliment you on the very impressive DGMP. We appreciate the care that you took to consider the monument as a part of the larger Siskiyou ecoregion, and to include the political, historical and cultural context. These considerations are very important, but are often overlooked when land management decisions are being made. Further, the biological uniqueness of the monument and the area that surrounds it is honestly recognized in the DGMP. On page 76 it is stated that "The monument lies within a forest region perhaps more diverse and complex than any other in the West. The monument's forest types are not well represented elsewhere in preserve status." This is one of many encouraging indications throughout the document that the value of the area is not being underestimated in the process of deciding its fate.

However, based on the information in the DGMP about the important water resources, old-growth dependent animal species, and unique vegetation of the land surrounding the Oregon Caves National Monument, it is clear that *the preferred alternative is insufficient* in that it only addresses the minimum requirements of protection. The recent logging that has occurred on the land immediately surrounding the monument is enough proof that its designation as a Late Successional Reserve is not adequate protection for its water resources and plant and animal life. It is important that this area be given *maximum* protection so that it might survive for future generations. We suggest that the monument's boundaries be expanded to include all federal lands in the Sucker/Grayback Creek watershed, making the Oregon Caves National Monument a healthy 48,000 acres.

Thank you for your efforts to further protect the exceptional Siskiyou ecoregion.

Sincerely,

Adrienne Reed Storey

Adrienne Reed Storey

Letter 27: Klamath Forest Alliance

Thank you for your comments.

L-46

Rogue Group Sierra Club
84 Fourth Street
Ashland, OR 97520
(541) 482-0412
"Protect America's Environment: For Our Families, For Our Future"

February 27, 1998

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MAR 02 1998
OREGON CAVES
NATIONAL MONUMENT

Superintendent Craig Ackerman
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Craig:

The Executive Committee of the Rogue Group Sierra Club and its 1,300 members in Jackson, Josephine and Curry Counties enthusiastically support the expansion of the Oregon Caves National Monument. It is long overdue!

79

We have reviewed the draft Management Plan/Environmental Impact Statement and endorse Alternative C. In addition, we believe the Monument would be best served by an extension of the southern border to include the nearby logging road. This would serve to protect the caves from fire hazards, vehicle traffic, road-related landslides, loss of vital topsoil, and invasion of noxious weeds and alien plants in a botanically rich area. Needless to say, the viewsheds are magnificent from this southern border and everything should be done to preserve them.

A larger, more visitor-friendly Oregon Caves National Monument will be of great pride to the people Southern Oregon and of great economic benefit to the residents and businesses of the Illinois Valley. Again, our congratulations.

Cordially,

Charlotte Holzkamper

Charlotte Holzkamper, Chair
Rogue Group Sierra Club

Letter 28: Rogue Group Sierra Club

Thank you for your comments.

COMMENTS

L-

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FEB 2 1998
OREGON CAVES
NATIONAL MONUMENT

Klamath Mountains Conservation Task Force
Response to the Oregon Caves Draft Management Plan of Dec. 1997.
Submitted by Steve Knutson, [redacted] Director, Klamath Mtns Conservation Task Force, National Speleological Society.

Quite a report, folks--great job! I can appreciate that there are a lot of person-hours in this. In general, the only thing I would have done is list the "no change" alternative LAST, but I assume you are trying to be more than fair... Also, (this may be in there somewhere but I didn't see it) the control of the buildings by the concession is hurting the volunteer efforts and a huge amount of work is done by volunteers.

Regarding tour size I think 10 per tour would be better than 14-16.

An NPS interpretive center is really necessary--there is so much that the public woood be interested in and the concession has made no effort to provide for this.

The land expansion is also necessary. Just to include the karst hydrology of the caves marble outcrops. There is now a karst resurgence on Lake Creek and a karstified stream sink on the S Fk of Panther Creek.

A thought I have had for awhile is that the main cave entrance area would be much mor "natural" (better for tourists) if the inner parking lot were removed and the driveway from the outer parking lot made just a walkway with golf cart type electric vehicles to shuttle people and baggage to the hotel.

80

Here is my input specific to content by page:

page 4: "Significance of Monument"

3rd sentence--the outcrop is marble; the limestone precursor formed on the sea floor, etc...invades into the marble, not limestone (there is at present no limestone). Picky, picky.

2nd paragraph, 2nd sentence: a jaguar skeleton was not found. A jaguar skull and several associated bones, apparently from the same specimen were identified by a paleontologist. They were discovered by cavers 20 years before. These bones have NOT been dated. It is presumed that they are older than radiocarbon dating (which explains the lack of such) and thus are presumed by all concerned experts to be OLDER than 40,000 ybp. Indeed, specialists give this fossil a chance to be at least 200,000 years old. Calcite has been scraped off these fossils and will be Uranium/Thorium dated, which if successful will give a minimum date. 1

Not stated is the presence of a number of sets of bear scratch marks and a single print of a large cat deep in the cave and almost certainly at least as old as the last glacial cycle at the end of the Pleistocene. This has to be so since one must postulate an entrance in that part of the cave now closed. Only a handful of caves in North America contain Pleistocene animal marks.

4th paragraph: The River Styx does NOT flow through the cave. The River Styx passage is a separate trend from the main part of the cave. The streams in the main part of the cave have been measured for flow rate and found to be about 1/10 of the River Styx 2

RESPONSES

Letter 29: Letter Klamath Mountains Conservation Task Force

1. The paragraphs were corrected.

2. The paragraph was corrected to read "part of the cave" Much of the drainage in the upper part of the cave is a tributary of the River Styx.

3. Similar language has been added in response.

4. It is true that no mineral survey or systematic analysis was done, but that was never stated in the draft GMP. It is true that a "detailed process of inventorying and mapping" was done. A few X-ray analysis, crystal morphologies, and density tests with bromoform liquid indicate that most if not all of the carbonates in the cave are calcite although perhaps changing the sentence to read: "Nearly all of the formations and bedrock of the cave *likely* are made of the mineral calcite" would be more accurate.

5. The term flowing water does not imply that the cave is largely vadose in origin although the last sentence on the page has been changed to read "flowing water coming directly from *or close to* the surface.

6. The fourth paragraph on page 72 should read "upper Cave Creek *and its tributaries and drainage area*," since the main water flow in the main cave occurs along the strike of the bedding planes/foliation (Droege, 1998), it seems reasonable to suppose that some water in marble areas from outside the Monument to the north is entering caves or proto-caves in the Monument along bedding planes. However, Upper Cave Creek and its drainage area and tributaries is almost certainly the primary recharge component of River Styx in Oregon Caves, as demonstrated by ground-water traces, similar concentrations of the major ions in Upper Cave Creek and the cave, the lack of high silica and magnesium ionic concentrations in cave water (indicating that serpentine and quartz diorite areas off the Monument are not a major water source) and the sufficiency of precipitation minus estimated evapotranspiration (based on chloride ratios and studies in similar habitats) within the likely drainage basin to supply the observed flow from the cave and from other springs."

(to which they are tributary). Futhermore, the River Styx is NOT the "underground portion of Cave Creek" Cave Creek is a surface stream that sinks (except in flood conditions) higher on the mountain than the cave and has been dye-traced to the River Styx. But the flow rate of Cave Creek is only a fraction of the flow rate of the River Styx. Thus the combined flow of Cave Creek and the streams in the main part of the cave are only a part of the flow of the River Styx. The remaining flow must be explained by seepage flow from within the mountain (meaning a greater watershed than currently credited) or from the sink of the S fork of Panther Creek, a karstified stream sink near the north edge of the monument.

2

Not stated is the fact the tour route, with its twists, turns, climbs, descents, narrowness, low ceilings and length, is probably the most adventuruous cave tour route in North America if not the world. This tour route itself is a historic artifact, being created in a time when labor was cheap--indeed it was probably mostly carved out by volunteer entreprenours who hoped for riches guiding tours. Much of the present tour was originally belly-crawl, converted into walk ways by blasting in the 1800's. As John Roth has said, no one finding such a cave now would dream of making it into a tour cave--the cost would be prohibitive. Thus we have a tour that is more like real cave exploration than probably any other cave tour in the country.

3

Not stated is that this is the longest tour cave west of the Continental Divide.

Not stated is that in the volcanic and metamorphic west, solution caves are much smaller and rarer than in the sedimentary midwest and east. Until the discovery of Bigfoot Cave (5 miles within the Marble Mtns Wilderness in N California) in 1974 Oregon Caves was the longest solution cave in a 1000 mile radius.

Not stated is that Oregon Caves has a high percentage of decorated passage and when discovered was a fairyland of delicate formations. Much of this has been marred by a lack of security but much beauty still exists.

Paragraph 5: Even the incomplete biological survey (Only trapping has been done--some species are not trapped) has revealed several endemic species of cave-adapted life. In fact, Oregon Caves is one of the highest ranking caves in the country for the number of endemic species, and there are most likely more to come.

Not stated is that there may be rare mineral forms (such as the sub-minimum-diameter soda straws that are present). No mineral survey or inventory or systematic identification has been done.

4

Not stated is that Oregon Caves possesses a more extensive and varied display of "clay worms" (clayish, slimy, vermicular wall formations) than any other cave in the west.

Page 11 "Adequacy of Cave Security Systems"

High-tech security systems are well and good, but it is my opinion that Oregon Caves will never have proper security until someone is assigned that responsibility. The superintendent has said that instead he regards security as the concern of all employees. Certainly all employees SHOULD be concerned but such security-by-committee has clearly not worked in the past and will

not work in the future. Witness the recent (Nov-97?) illegal access of the animal scratch marks area resulting in fresh initials scratched in the mud next to the marks.

Page 69: "Cave Resources"

Paragraph 5: The statement is entirely without support. No mineral survey, inventory or systematic analysis has been done. Considering the complex geology it is in fact LIKELY that there are rare minerals in the cave.

For other considerations, much of what is stated under "Significance of the Monument" above is also applicable here.

Page 70: "Water Resources"

Paragraph 2: The River Styx in NOT just Cave Creek, and does NOT flow through the cave. Its cource as explored is in a separate trend from the main part of Oregon Caves. Waterwelt (sic) is actually "Waterwhelp" and is expressed on only one old map. No one uses this confusing term and this creek will be referred to as the South Fork of Panther Creek, which it is. It does NOT flow (under normal summer conditions) into Panther Creek but rather sinks at a marble contact a little way below Big Tree. This is the largest sinking stream on the monument but has not been successfully dye-traced. I presume it is at least part of the unaccounted flow of the River Styx but there is a karst resurgence on Lake Creek that is equidistant. A karst resurgence about half the flow of the River Styx is below the inner parkinglot and Hotel. It has not been dye-traced.

82

Page 71 "Karst Hydrogeology"

5 I disagree--Oregon Caves shows phreatic solution on a number of distinct levels (water table horizons) and though the vadose development is extensive, I estimate a majority of the passages are basically phreatic. Volume of development--don't know which is majority. The piracy of Cave Creek and S Fk Panther Creek are both very recent occurrances. At both sink sites there is no sinkhole or headwall development indicating that until recently these streams flowed normally down their courses. So I see a phreatic cave network that was later modified by vadose waters (an alpine karst?) like the Marble Valley cave systems in nearby Northern California.

Page 72 Paragraph 4:

6 Again, this can't be true--Upper Cave Creek is too small to be anything but a minor component of River Styx. Furthermore, S Fk Panther Creek is estimated twice the flow of Upper Cave Creek. As to the water chemistry, this may merely reflect the shielding of the flowing stream from the marble surface by insoluble silt and gravel that commonly lines the bed of the stream. The unaccounted portion of the River Styx flow could in fact be coming from some distance, making its way through the non-marble rocks until it reaches marble, to flow then through passages lined with insolubles.

S Fk Panther Creek is a karstified stream on the monument that may well dye-trace to Oregon Caves. If so, there is a sizable area

6 on the slopes of Mt Elijah that are in the Oregon Caves watershed but outside the monument. Even if this proves not to be so, the excess water in the River Styx must come at least partly from outside the monument. Apply the volume flow to the annual rainfall budget to get the size of the watershed.

Knutson

L-448

SISKIYOU PROJECT

P.O. Box 220 Cave Junction, Oregon 97523 (541) 592-4459, fax: (541) 592-2653

Oregon Caves General Management Plan
National Park Service
Columbia Cascades System Support Office
909 1st Ave Ste 500
Seattle WA 98104-9882

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

March 10, 1998

Re: Oregon Caves National Monument Draft General Management Plan and EIS

Dear Superintendent Ackerman:

The Siskiyou Regional Education Project and the below signed organizations are pleased to have this opportunity to comment on the Draft General Management Plan for the Oregon Caves National Monument. We are all nonprofit organizations that represent many thousands of members in Oregon and nation-wide who care deeply about the public lands of this region.Our groups are concerned about the globally significant Klamath-Siskiyou bioregion, the largest relatively intact wildland on the West Coast and one of the most biologically diverse temperate forests in the world— an area that includes the Oregon Caves National Monument. We request that you place our comments in the formal administrative record.

To begin with, we would like to compliment you for the thoroughness of the document. Your candid response to the legal obligations governing management of the national park system is laudable. As you amply described in the Draft, the National Park Service and its mission are clearly distinguished from all other federal land agencies. We would like to commend you for placing the issue of the Oregon Caves into a larger ecoregional, socio-economic, political and land management context.

The NPS is charged by law and policy to review the adequacy of the Monument boundary during development of the GMP. We agree that you must review both the past and present management of lands surrounding the Monument and we feel that it was proper to discuss the political controversies over logging in the area. This history is an essential element of the affected environment and we thank you for including it.

Although it fails to offer realistic boundary changes which protect all the Monument's resource, we support most of the important changes offered by Alternative C such as NPS personnel offering interpretive services and cave tours, NPS acquiring possessory interest in all buildings and converting the lower level of the Chalet into a Visitor Center. We believe that the objectives in Preferred Alternative C are the bare minimum necessary to meet the requirements of applicable environmental law and policy, and yet they are not adequate to protect the Oregon Caves National Monument. As you know, Oregon is not blessed with designated Park land commensurate with the quality of its natural resources. Indeed, the Klamath-Siskiyou ecoregion is one of the most ecologically significant landscapes in North America and it is almost totally

1

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Letter 30: Letter Siskiyou Project

1. Please see new language added to the Alternatives chapter, Alternatives Considered but Rejected, item 7.

2. We agree that the Klamath-Siskiyou ecoregion is one of the most ecologically significant landscapes in North America and it is under-represented in the National Park System. However we are constrained by our various mandates in the formulation of alternatives in our general management plan to focus on what will best protect present-day Monument resources and serve the needs of visitors within the present-day Monument. Please see NPS response to Letter 23 regarding the suggestion of designating State Route 46 as an Oregon Caves Parkway.

under-represented in the National Park System. The portion of the Klamath-Siskiyou in the Oregon Caves is a biological island in an archipelago of clearcuts, tree plantations, and tiny remnants of uncut forest. Therefore, the Oregon Caves National Monument is an extremely important resource. These caves also give us an extraordinary chance to see a part of the world most of us never even think of and to deepen our understanding of how the world works. Like the forest above them, they are also extraordinarily beautiful.

Although we believe that the background and contextual information in the Draft was well researched and clearly thought out, the alternatives offered, including the Preferred Alternative, leave much to be desired. Alternative A is totally unacceptable because it offers no changes to the Monument boundary, interpretive services or visitor services. Alternative B, while offering a change in Interpretive services and visitor services is also unacceptable because it offers no change to the Monument boundary. Alternative D is also lacking in vision; the addition of 2,373 acres into the Monument offers less protection to the organisms inhabiting the Monument's forests than does Alternative C, and is not even adequate to protect the Monument's water supply and resources.

We believe that all of the alternatives offered by NPS, although they are mindful of the current political situation, offer no vision of the future in which Oregon Caves National Monument rightfully takes its place as one of the treasures of the Park System. We believe that NPS needs to incorporate the best of all the Alternatives into a new Proposed Alternative which:

- Expands the boundary to include all Federal lands in the Sucker- Grayback Creek watershed,
- Replaces the current system of concessionaire led cave tours with NPS personnel offering cave tours, and
- Increases visitors services by creating an on-site visitors center and interpretive center, a museum, and a park library.

The most critical need of the Caves National Monument is boundary expansion so that the Monument can be adequately protected. On July 12, 1909, President William Taft issued a Presidential Proclamation that, "Oregon Caves National Monument, herein referred to as the Monument, was established ...as an area of unusual scientific interest and importance, and it appears that the public interest will be promoted by reserving these caves with as much land as may be necessary for proper protection thereof..." (US Code, 1909). This proclamation, along with the Organic Act of 1916, establishes that the purpose of the Monument is *to protect, preserve and interpret the natural, scenic, and cultural resources of Oregon Caves National Monument in such manner and by such means as to preserve those resources for future generations.* The current boundaries are not adequate to protect the Monument resources and natural ecosystems (both above and below the ground) in a manner that is consistent with either President Taft's proclamation or the Organic Act of 1916. Although the cave is the prime resource through legislative intent, there are no primary or secondary resources from an ecological standpoint.

The Preferred Alternative would expand the Monument by 3,310 acres through a boundary change with the Siskiyou National Forest. The rationale is largely based on protection of the Monument's watershed since the caves were created by surface and subsurface water

originating in the watershed, and the monument draws potable water from the watershed. Certainly, the modest addition of 3,310 acres is likely the bare minimum necessary to ensure conservation of the primary cave resource and to ensure the health and safety of potable water supplies. In reality though, **the Preferred Alternative is inadequate to protect all the Monument's resources.**

Our primary reason to expand the Monument's boundaries is for the protection of the above-ground biological resources. The Monument lies within the Klamath-Siskiyou Geological Province, one of the most botanically diverse areas in North America. Its forest ecosystem is significant regionally, nationally and internationally. The ecosystem surrounding the Monument, the Klamath-Siskiyou eco-region, needs to be protected to meet Goal 1, Mission 1.a of the *1997 National Park Service Strategic Plan* which states that "natural and cultural resources and associated values are protected, restored, and maintained in good condition and managed within their broader ecosystem or cultural context."

To meet this goal, we believe that the expansion of Oregon Caves National Monument needs to include the entire upper Sucker-Grayback Creek watershed. This would protect both the water resources as well as the old growth forests of the Monument. We propose that the expansion include all federal lands in the watershed, which total approximately 48,000 acres. "The forests in the (Sucker-Grayback Creek) watershed are among the most productive in the Illinois basin. Sucker Creek is the principal producer of salmonid fish in the Upper Illinois (above Cave Junction). Developed recreation and tourism are higher in this watershed than any other in the basin." As well, "the watershed provides habitat for many plant and animal species valued for their commercial, aesthetic, or intrinsic worth." (U.S.D.A. 1995).

98

And yet, this watershed is still unprotected, even now that changes have been made to the Northwest Forest Plan. From our experience, we find it unlikely that the Forest Service would agree to manage the Late-Successional Reserves to the required National Park Service standards. They certainly have not done so to date, and current Northwest Forest Plan guidelines pertaining to management do not meet NPS standards (see, for example, the recently proposed Layman timber sale). It would be far better to take the necessary step of amending the Monument boundary once and for all.

The forest communities of the Siskiyou are like those that covered the entire continent during the Eocene epoch and are no longer found anywhere else. There are over 275 species of flowering plants known in the Monument alone, a high number for the Monument's small size. At least 23 Klamath Province plant endemics occur in the Monument, about 5% of the Monument's total flora. Over 30 species are marginal, meaning that they are near their range limits. The endemics and marginal species are very vulnerable to change and disturbance. Of the seven plant community types identified in the Monument, the Douglas-fir/oak type represents the upper bounds of the Mixed Evergreen Zone in southwest Oregon and mostly surrounds the developed zone of the Cave. The White fir/herb type is the highest elevation community type at the Monument and is transitional to the Red Fir Zone. It contains the oldest trees at the Monument, including the Big Tree. Importantly, the Monument's forest types are not well represented in other preserves.

The history of land management on Forest Service lands in the Sucker-Grayback watershed threatens the forested ecosystem of the Monument. In 1948, 53% of the Sucker-Grayback Creek watershed was comprised of four large patches of older forest (mid, late, and

climax habitat). These patches were 6,594 hectares, 2,075 hectares, 892 hectares, and 731 hectares in size, were well-connected, and found in a mosaic that also included younger successional forests (U.S.D.A. 1995). During the 1940s, 27 hectares were clearcut in the watershed. This rose sharply to 235 hectares in the 50s, 1215 hectares in the 60s, 600 in the 70s, and 877 in the 80s. These figures account for only 72% of the area from which timber was cut in the watershed — the remainder was "thinned" or logged by a "shelterwood" method that involves leaving 1-3 trees per hectare. A total of 4,352 hectares of land in the watershed have been managed by either clearcutting, thinning, or shelterwood cutting. Currently 35% of the watershed contains uncut forest of mid, late, and climax successional stages, a reduction of 34% since 1950 (U.S.D.A. 1995). However, even though there is a large portion of uncut forest left, this forest is highly fragmented. All of the large patches of older forest mentioned above are no longer present in the watershed; forest fragments range in size from 0.3 to ~1000 hectares (Mills 1995, Jules 1998).

As importantly, road building has proceeded concurrently with logging. In 1930 there were 3.4 km of roads in the watershed, in 1950 it rose to 13.2 km, and by 1970 it had reached 179.44 km. As of 1989, 286.9 km of roads had been built, which means that for each square kilometer within the watershed there are, on average, 1.15 km of roads (U.S.D.A. Forest Service, Grants Pass, Oregon). The Oregon Caves is part of the largest tracts of intact forest left in the watershed.

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1

Effects from adjacent roads and clearcuts can include changes in temperatures, windthrow patterns, fire cycles, herbivory, and pollination success. Many such effects can extend into an old growth forest more than 500 feet from the forest edge (Chen et al. 1995). For example, trillium (*Trillium ovatum*) within old growth forests are not able to reproduce successfully when within 300 feet of a clearcut (Jules 1998). Also, forest-edge-dwelling predators such as raccoons, skunks and pine martens may take advantage of adjacent clearcuts and increase predation rates on Monument birds. Besides edge effects, the amount of old growth forests has been decreased to about 20% in the Grayback-Sucker Creek drainage. Habitat reduction of this amount in other areas has eventually eliminated over 10% of animal species still living in the remaining habitat (Resources Management Plan: Oregon Caves National Monument, 1994). Numerous studies indicate that species in the region are negatively effected by nearby clearcutting. For example, California red-backed voles (*Clethrionomys californicus*) appear to be restricted to old-growth forests and are found in lesser abundance near forest edge. These voles are almost never found in clearcuts. The mechanisms responsible for these distribution patterns can be quite complex; in the case of red-backed voles, the reduction in truffles, the below-ground fruiting body of many mycorrhizal fungi, near edge and clearcuts is responsible (Mills 1995). The Monument has been and will be negatively affected by species loss on surrounding lands. Such loss is not commensurate with the Park Service's mandate to protect all the resources of the Oregon Caves.

Logging has probably caused the migration of old-growth dependent species into the Monument even though there is not enough habitat to sustain them over the long run (a process called "packing"). This may be true for the Northern spotted owls (*Strix occidentalis*) currently on the Monument. Northern spotted owls are an indicator species for the health of old growth forest ecosystems in the Pacific Northwest. In the Klamath Province, which includes the Caves, the owls are declining at a rate of 16% per year. Partly because the owls are long-lived, declines

in their populations have lagged behind the collapsing habitat. This indicates that much more population loss might occur than can be currently predicted, and that it will continue even after habitat losses have been arrested. A spotted owl pair has flown within the Caves area for the last decade. However, the size of the Monument is too small to provide food for them. The many adjacent clearcuts or partial cuts reduce the local suitable habitat so this pair may be the last one to be found in the Monument (U.S.D.I., 1994).

Meadow communities in the Monument are also threatened by adjacent logging. Meadows occur where there are relatively infertile soils from quartz diorite, meta-basalt, or serpentine and where wind piles up snowbanks on the lee side of ridges. The long-lasting snow and unusual soil mineralogy discourages the growth of trees through temperature and soil moisture limitations, respectively. Generally, only drought resistant trees, like tan oak, Garry oak or Sadler oak, can grow here. Clearcutting above these meadows could alter wind patterns and thus reduce snowpack distribution. This, added to the effects of fire suppression, could eliminate the meadow community from the Monument. Of particular concern is that the only serpentine area on the Monument is directly on the south-central border with USFS lands. Logging or other land use could threaten the regional endemic and disjunct species on this small area.

In addition, habitat reduction and past hunting and predator control activities outside the Monument have helped extirpate mammals from the Monument's lands. These extirpated species include the grizzly bear and Roosevelt elk, probably the wolf, possibly the mink, pocket gopher (*Glacomys* sp.) and fisher, and at least several species of vascular plants (U.S.D.I., 1994).

Another important reason to expand the Monument boundary is based on the protection of the Monument's water resources including its water supply. The water supply for visitors and Monument staff have been impacted by USFS management activities. The Monument's public water supply comes from Lake Creek, an adjacent drainage on USFS land which flows from Bigelow Lakes. Currently, the grazing of both cows and horses negatively effects the water quality of Lake Creek. In fact, the water supply of the Caves was shut down in the 1980's because of soil erosion most likely caused by recent logging on USFS land.

Potential human threats to the Cave's water supply include logging, mining, herbicide use, petroleum spills, soil compaction, trail erosion, micro climatic change, and temperature changes occurring upstream on Forest Service land. Some of these management activities could cause a decrease in the quantity and quality of water entering the Monument lands.

Decreased water supplies could alter surface and subsurface water flows. This could alter the growth of cave formations and their variety. For example, decreased infiltration probably would favor stalactite growth over stalagmite growth because during slow drippage water droplets stay longer on stalactites and thus are more likely to lose carbon dioxide and deposit calcite.

To reiterate — there is no doubt that Oregon Caves National Monument needs to be expanded. None of the alternatives - including the Proposed Alternative - offer adequate protection to all the Monument's values. Expansion of the Monument to include all the Federal lands in the Sucker Creek watershed would better protect all the Monument's resources and would be fully consistent with both the Enabling Legislation which established the Monument in 1909 and The Organic Act of 1916.

The second most critical need of the Oregon Caves National Monument is to have interpretive services be offered by NPS personnel. *Management Policies* (1988) of the

National Park Service (NPS) states that "a decision to authorize a park concession will be based on a determination that the following conditions will be met: The facility or service is necessary and appropriate for public use and enjoyment of the park in which it is located. The use of the facility or service will enhance the use and enjoyment of the park without resulting in impairment of park resources and values. The facility or service will be located where the least impact on park resources and values will occur."

It is very clear that the current system of having a for-profit concessionaire offering interpretive tours of the Caves is not working and is not appropriate for the public. The priorities and the methods of the current concessionaire are clearly different from those of NPS48 which distinctly states that "Parks should strive for a balance in interpretation, with personally conducted services carried out by a professional staff..". It is time to change.

We believe that the NPS staff should provide the essential interpretive services in the future to increase accessibility and an in-depth understanding of cave processes as well as to reduce direct human impacts on the cave. In fact, we believe that without such high quality interpretive services, the Caves can not accomplish its basic management objectives. This is based in part on the proclamation establishing the Monument "...as an area of unusual scientific interest and importance, and it appears that the public interest will be promoted by reserving these caves with as much land as may be necessary for proper protection thereof..."(US Code, 1909). The "area" in the proclamation language is clearly the main cave within the Monument. This proclamation, along with the Organic Act of 1916 and subsequent NPS policies, establishes that the purpose of the Monument is to protect, preserve and interpret the resources of Oregon Caves National Monument in such manner and by such means as to leave them unimpaired for future generations.

We believe that having the NPS staff provide the essential interpretive services would increase the quality of the interpretation. Decreasing the number of visitors per tour would prevent an adverse impact on cave resources. Both of these would better conform to the Federal Caves Protection Act of 1988 and the NPS *1997 Strategic Plan.* It would also allow the use and enjoyment of the Monument without resulting in impairment of the resources and values which are consistent with *The Management Policies* (1988) of the National Park Service. Cave ecosystems tend to have both low resistance to human-caused impacts and low resilience. The same conditions that preserve a wide range of resources from surface erosion, etc. will also preserve human impacts for a long time. Regeneration after impact either doesn't occur or usually occurs very slowly.

The third critical need is for an expansion of visitors services to include an on-site visitors and interpretive center and a park library. The 1995 visitor survey suggested that a large percentage of respondents felt that an on-site visitor center was worth consideration and previous master plans for the Monument have also supported such a center. We believe that the Chalet building would make an excellent visitor\interpretive center.

The Oregon Caves National Monument needs an on-site visitor and interpretive center because Oregon Caves has what few National Monuments have. Fossil bones, most likely from a single grizzly, have also been found in Oregon Caves. Although only about 1% of the original protein remained in the bones, there was enough to determine that the age of the bones and the cave must be at least 46,400 years old. Jaguar bones were also found in Oregon Caves in August of 1995. The size of its bones compare with jaguars living in North America between 15,000 to

40,000 years ago. The bones could have been buried and then later washed into a much younger Oregon Caves. However, the completeness of the skeleton, perhaps the most complete jaguar fossil ever found, argues strongly against this possibility.

There is also a need for a museum, and a park library to manage information about park resources. The lower level of the Chateau would make an excellent site for a museum. Oregon Caves National Monument has a museum collection of 1351 catalogued objects. Most items are herbarium specimens (1194) and archival (148, mostly historical photographs). Five items are missing. The condition of most specimens is excellent. Some of the plant specimens have broken stems, etc., but little scientific value has been lost. Nine historic artifacts were recovered during cave restoration. Some have undergone accelerated deterioration since removal from the fairly constant climate of the Cave. There is a need for a permanent home for this collection.

We agree with Alternative C in that the NPS should purchase the possessory interests of the concessionaire. Since NPS holds title to the buildings it will better facilitate the goals of the NPS and mission of the Caves National Monument if the NPS also has possessory interest.

The fourth critical need is to restore the Caves as closely as possible to the condition prior to their discovery. The Organic Act of 1916 establishes that the purpose of the Monument is to protect, preserve and interpret the natural, scenic, and cultural resources of Oregon Caves National Monument in such manner and by such means as to preserve those resources for future generations. In order to mitigate past and future human impacts and restore the Caves, we must understand the ecological processes most likely to be affected by human activities and facilities in order to insure that management decisions and programs are consistent with maintaining or restoring these processes.

We would therefore like to advocate for the **fifth critical need - expanded scientific research** - in order to obtain baseline data on the Cave's hydrologic, biologic, geologic, historic, paleontologic, and ethnographic resources. NPS policy states that "The National Park Service will assemble baseline inventory data describing the natural resources under its stewardship and will monitor those resources...to detect or predict changes (NPS Management Policies, Chapter 4:4, 1988). NPS policy also requires that the Oregon Caves National Monument Superintendent know the nature and condition of the natural and cultural resources under his/her stewardship, have the means to detect and document changes in those resources, and understand the forces driving the changes in order to fulfill the NPS mission of conserving parks unimpaired. Currently, the staff at the Caves National Monument do their best to follow these NPS policies but they are seriously under-staffed and under-budgeted. In order to protect, preserve and interpret the natural, scenic, and cultural resources of Oregon Caves National Monument in such manner and by such means as to preserve those resources for future generations, additional staffing will be required at the Caves.

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2 Living in the Illinois Valley it is clear that the experience of a visitor to Oregon Caves begins at the Illinois Valley Visitor Center, and culminates with the cave tour or a hike through the old growth forest within the Monument. We agree with The Wilderness Society's assessment that "the plan appears to lack any substantive vision or recommendations regarding the visitor experience along the intervening 22 miles" between the IV Visitor Center and the Monument. We support their proposal for an Oregon Caves Parkway which would broaden the visitor experience substantially. It may encourage longer visitor stays with a corresponding higher level of local economic activity and could have the added ecological benefit of establishing a linear

2 corridor of protected land to provide a more solid biological link between Oregon Caves National Monument and lower elevation lands in the Illinois Valley.

We would like to reiterate what we have stated. First of all we believe that the Oregon Caves National Monument Draft GMP and EIS adequately places the Oregon Caves into the ecoregional, socio-economic, political and land management context. It is in fact fairly thorough. It, however, presents an insufficient range of alternatives which do not meet the protection needs of the Oregon Caves.

While there are parts of all of the Alternatives that have merit, we find them all lacking. Alternative C meets NPS and Oregon Caves goals and policies better than any of the other alternatives. Yet, the boundary expansion contained within it is not adequate and will not protect the Monument's resources. We strongly urge NPS to strengthen the plan and broaden the vision. This needs to be done, at a minimum, by proposing Boundary changes that can realistically protect all the resources of the Monument.

In conclusion we would like to add that we are very pleased with the quality of the staff employed at Oregon Caves National Monument. We are impressed with their knowledge and with their commitment to protecting the Monument. We have enjoyed our working relationship on a number of projects and we look forward to working with them in the future. Thank you again for this opportunity to participate in the management of one of our treasures. Please send all further NEPA documents and decisions to all organizations listed below.

Yours truly,

Barry Snitkin

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Barry Snitkin and Erik Jules, Ph.D
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Western Ancient Forest Campaign

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Headwaters

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U.S.D.I. National Park Service
1994 Resources Management Plan: Oregon Caves National Monument

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COMMENTS

L-5490

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

March 12, 1998

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Cave Highway
Cave Junction, Oregon 97523

Re: Oregon Caves National Monument Draft General Management Plan and Environmental Impact Statement

Dear Superintendent:

We are submitting the following comments on the Draft General Management Plan and Environmental Impact Statement for Oregon Caves National Monument. We request that you place them in the formal administrative record. The Oregon Caves National Monument is very important ecologically, economically and culturally to southwest Oregon and the Siskiyou Mountains of the Klamath-Siskiyou Region. The General Management Plan will guide the management of this park for the next 15 years, thus it is critically important that could consider the most ecologically advantageous alternative.

You did an excellent job producing the DEIS (except we would have preferred to see a higher recycled content in the paper used). The standards you have set in your preferred Alternative C are the minimum necessary to meet the requirements of applicable environmental law and policy for the Park Service. We support the proposed expansion of the Monument and returning the responsibilities for interpretive services and the caves tours to the National Park Service.

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Concession/Interpretive Services:

In addition to protecting the ecological values of the Oregon Caves and its surrounding ecosystem, we feel that the emphasis of the Monument's Management Plan should focus on interpretive, educational and cultural service to the public. The private commercial focus of concession services should only be to provide some limited food services to the public. Any other privatization of income resources from the public facilities should be prohibited.

At present, this is the only Park Service area in the country in which the main resource is interpreted solely by a private company. It appears that the current interpreters are young, minimum wage earners. Along with the fact that the NPS pays for all supporting facilities, this is a gold mine/gravy train for the owners of the concessions. This privatization of public resources is unnecessary, and should now be returned to the public. The concessions appear to be spending many thousands of dollars in advertisements and lobbying efforts to convince the public and legislators that the preferred alternative will cost over a million dollars in lost revenue (because the concession will not be doing as much advertising), reduce state and federal income taxes (which is untrue) and cost the taxpayer $270,000 more each year. The later is the cost of running a visitor center, paying for EMS, fire protection, etc. and has little to do with cave tours. The Park should resist this pressure, and do what is ecologically in the best interest of the Cave resources.

We also prefer to have Park Service guides give smaller sized cave tours, as this would provide better interpretation and likely reduce human impacts on cave resources. All the fee money collected should go into salaries for resource protection and interpretation at the Monument.

RESPONSES

Letter 31: Umpqua Watersheds, Inc.

Thank you for your comments.

Park Expansion:

We support the preferred alternative to expand the Monument's boundaries to a total of 3,310 acres to protect the water resource from grazing and to reduce the edge effects and impacts from surrounding Forest Service management practices. As noted in the document, the NPS is charged by law and policy to review the adequacy of the Monument boundary during development of the GMP. In so doing, you correctly determined that such review must be based, in part, on the political context within which you plan, as well as past and present management of surrounding lands.

In order to protect the water resources of the Oregon Caves and the Monument facilities and to restore the watersheds surrounding the Oregon Caves, the Monument expansion should include all Federal lands in the Sucker-Grayback Creek Watershed. This would also in the near future provide expanded recreational, interpretive, scientific and educational benefits to public and the communities of Southwest Oregon and to the management and protection of the Oregon Caves. It is especially important that the Bigelow Mountain and Bigelow Lakes Botanical Area are included in the Monument and grazing and other activities, which are impacting the ecological, recreational and aesthetic values of the area, are discontinued.

Conclusion:

Thank you for your outreach to the visiting public. We hope that relationship can be expanded with the physical boundaries of the Monument. The Draft EIS is excellent, however, we are concerned with the glossy nature of the DEIS, and the accompanying letter inviting us to comment. It does not appear to have been printed on a high content of post-consumer recycled paper, and likely used toxic bleach to produce such shinny, white paper. Your DEIS would have been just as effective on non-bleached, non-chlorinated, 100% post-consumer recycled paper. Please consider using our natural resources more carefully in the future.

95

Sincerely,

Francis Eatherington

Francis Eatherington
for Umpqua Watersheds, Inc.

L-33

SPALDING & SON, INC. *Lumber Manufacturers*

February 17, 1998

Craig W. Ackerman
Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

RECEIVED
FEB 20 1998
OREGON CAVES
NATIONAL MONUMENT

Re: Draft General Management Plan for Oregon Caves National Monument

Dear Mr. Ackerman:

The opportunity to attend your open house at the council chambers in Grants Pass was not only very much appreciated but was very informative as well. I learned in just a few minutes time that the plan called for a bureaucratic expansion of staff, budget and control over the surrounding land. Somehow, this doesn't fit with the mood of the nation, which seems to be less government, at less cost, with fewer people. However, the purpose of this letter is to give constuctive input and suggestions to make the plan work better when it is implemented. Although I do not support any particular alternative presented in the Draft General Management Plan, I do support some changes at the Monument that will make it better for the Park Service and the public that visits the Caves.

I am in complete agreement with the National Park Service (NPS) regaining control of the Monument. By this I mean two things, get the concessionaires out of the tour guide business and put the souvenir shop down at the Illinois Valley Vistor Stop. Also, the food service should be moved out of the Monument area as well as overnight lodging.

1 I view the expansion of the Monument area to 3800 acres as a land grab. The Siskiyou National Forest can manage this land much better than the NPS. The Forest Service is in the business of managing land and the NPS is in the business of managing people that visit the Parks, or in this case the Monument. The entire area that is proposed for expansion for the purpose of viewshed protection is classified by the Siskiyou National Forest as Late Successional Reserve where management is not for timber production. The land will only be managed if there is a natural disaster like insects, fire, or blowdown that makes the land need to be managed. It is a waste of time and effort to try to change the land classification from Late Successional Reserve. Remember, people come to see the Caves not to take in the view. Besides, what's wrong with the public seeing how the lumber and wood products that they use are produced?

2 I am also opposed to this proposed land grab because it will eliminate hunting.

Douglas Fir • White Fir • Sugar Pine • Ponderosa Pine • Incense Cedar

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Letter 32: Spalding and Son, Inc.

1. If the preferred alternative is implemented, it will not be a "land grab" but a transfer of administration of public lands to a different agency. We disagree that the NPS is only in the business of managing people. Visitor services and management of natural resources are inextricably related. Our primary mandate is to manage our lands in such a way as to leave them unimpaired. The term unimpaired has been interpreted by the courts and the NPS to mean the lack of or at least the lack of significant human impacts. Increased management of lands in response to a "natural disaster" can increase such impacts as can thinning , fuel breaks and roads allowed in LSRs. There is nothing wrong with the public seeing how the lumber and wood products they use are produced but the results of such usage can constitute impairment of scenic viewsheds in national park areas. Based on comments by a large numbers of visitors to the Monument in the last decade, many visitors do take in the view when they come to the caves even if that may not be the primary motivation for coming here.

2. There is no known record of fishing in the proposed expansion area; the two Bigelow Lakes and their outlets are simply too small to support much of a fish population. The only known camping area (adjacent to Bigelow Lakes) would be closed in order to protect the Monument's water supply. However, dispersed or "back-country" camping would be permitted in accordance with NPS guidelines. Public camping is also available at both the adjacent Cave Creek Campground and the nearby Grayback Campground. Hunting has become more popular in the last few decades with the advent of clearcuts that increased deer populations. Under LSR management, hunting would be expected to decrease due to regeneration of old growth forests. Hunting under the preferred alternative is likely to be prohibited in the proposed expansion area. The advantage is that visitor safety will be increased, especially in the Bigelow Lakes area which is expected have increased visitation if the Monument is expanded to include that area. Impacts on wildlife entering the Monument would also likely decrease. Since deer migrate outside the small proposed expansion, the main disadvantage of hunting restrictions would be the lack of convenience in retrieving downed deer near the Buck Whiskers area. However, considering the acreage still available for hunting in adjacent USFS lands, the reduction of hunting opportunities would be very small.

2 fishing, and camping. These are activities that are traditional in the area. They must be protected.

The issue of tour size and frequency is one that needs to be commented on. Your proposal is to provide fewer tours with fewer tourists in each group. Instead of sending them off every six minutes you propose to send them off every fifteen minutes and at the same time send them in smaller groups. It appears to me that the proposed schedule will not service all the tourists that are visiting the Caves. This proposal needs to be looked at again.

One item that really bothers me is that Headwaters was involved in the preparation of this document. That is allowing an advocacy group to make plans for you. Why didn't you invite Northwest Forestry Association or Southern Oregon Timber Industries Association to help you make the Draft General Management Plan? I would suggest that it would be inappropriate for you to accept any comments from Headwaters regarding this Draft General Management Plan as they have already had their turn. They have put themselves in a position of having to be neutral during the comment period.

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3 The role of fire and fire management is one that needs to be discussed as I understand that you almost burnt up the whole Monument area last fall. My understanding is that you had to call in Grayback Forestry, Inc. to save your bacon. It is because of a lack of fires in the entire area for the last seventy six years that timber harvesting needs to be done. Prescribed fire can only do so much. It will not change specie composition to be more reflective of what has been their historically. The problem now is that White Fir is occupying areas that traditionally have been Douglas Fir. Only through timber management and controlled use of fire can you change that situation. This is another argument why the Siskiyou National Forest should be in charge of the land surrounding the Monument.

It is my suggestion that the Monument be closed longer than just the months of December, January and February. Use seems to fall off during the shoulder seasons so I suggest that the Monument be closed from the middle of November to the first of April.

I am opposed to the construction of new trails and increased recreational activities. If the new trails and recreational areas were built or expanded it would only serve to exascerbate the problems the NPS has already identified.

The grazing issue is one that needs a little discussion. The grazing of cattle in the summer is not going to hurt the Caves. While the NPS concerns seem to be that the cattle may "poop" in the creek and thereby effect the water quality, the same can be said of the bears, deer, elk, and cougar. Also, what about humans that are hiking the trails? The Siskiyou National Forest will consider your concerns and limit the amount of cattle

3. The role of fire and fire management has been fairly well discussed in the revised GMP. There is always a risk of more fire during prescribed burns but the NPS feels that the risk of catastrophic fires from doing no prescribed burns is even greater. The Monument did not almost burn up last fall. About an acre of ground fire occurred outside the fire lines in an area that had been scheduled to burn in the future. The fire never advanced towards the Oregon Caves Historic District, and since the prescribed burn occurred in the driest part of the Monument, it was highly unlikely that the fire would have spread far regardless of unexpected changes in wind velocity and direction.

that they allow in the area. The elimination of cattle grazing is going to far.

I appreciate the opportunity to comment on the Draft General Management Plan and hope that you find my comments useful. If you have any questions do not hesitate to call.

Sincerely yours,

Robert P. Watson
Timber Manager

L-561

ROUGH & READY LUMBER CO.

March 12, 1998

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

RECEIVED
MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

Re: Draft General Management Plan and Environmental Impact Statement

Dear Mr. Ackerman:

We at Rough & Ready Lumber Company have reviewed your Draft Management Plan and Environmental Impact Statement. We are opposed to any expansion of the existing Oregon Caves National Monument boundaries. We feel that your Preferred Alternative C, along with Alternatives B and D, are uneconomical and unnecessary. These alternatives increase acreage, staff and budget but ignore both the already adequate protection of the Monument and the historic local uses of the land around the Monument.

We believe that the proposed expansion goes beyond the Park Service mandate. The Monument was created to protect the caves, not the forests surrounding the caves. While scenic viewsheds are nice, the Park Service's desire to create a wilderness setting is not in line with the general public's desire to visit a series of caves and the underground environment that is of interest.

We support needed maintenance on the existing structures and the possible need for improved Park Service employees living quarters and associated infrastructure, yet the cost of $4.3 million and an added $270,000 of operating expenditures per year seems excessive.

1 The need for expansion to protect the resource around the Monument has not been proven. We know that protection is and always will be there under the management direction of the Siskiyou National Forest. It seems implausible that things are going to change with the U.S. Forest Service and allow any form of timber harvest or road building near the caves. All lands proposed for expansion are in Late Successional Reserves and are fully protected. Any timber harvest in nearby drainages is done under the guidance of the Northwest Forest Plan in the form of thinnings and salvage and is done primarily to enhance forest health and reduce the risk of fire. In the Preferred Alternative C, the protection of the water resource in the Lake Creek drainage is discussed without any details about the problems with the current water supply. How can the Park Service improve on a system that does not need improvement? What would the Park Service do differently than is already done under the management of the Siskiyou National Forest in protecting the drinking water? Park boundary expansion and greater protection is unnecessary since adequate protection already exists. Does the National Park Service believe that they can somehow manage lands better that the Siskiyou National Forest? There was a near disastrous wildfire burn at the Caves last year. It seems that the Siskiyou National Forest is more experienced and capable of managing the land.

2

3 We object to the discussion of timber management and particular timber sales administered by the Siskiyou National Forest. The discussion of timber sales such as Sugarloaf, Buck Whiskers, and China Left are all negative. Many discussions and sources of information quoted regarding timber

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Letter 33: Rough and Ready Lumber Company

1. The proposed expansion would better protect the Monument by offering increased viewshed and edge effect protection from thinning and fuel breaks in LSRs, control of road density, and a reduction in exotic plant invasions.

2. Some of the problems with the current water supply was documented in the draft GMP. In addition, giardia was discovered in the Lake Creek water intake in the winter of 1998. Having our water supply intake under NPS administration would likely better protect the water intake from possible contamination of cryptosporidium and giardia from cows, from possible contamination of giardia associated with people camping directly beside Bigelow Lakes, and from increased turbidity resulting from road failure.

3. Some of the discussion of timber sales was removed as they were deemed not relevant to the purpose of the GMP. Discussions with the SNF has resulted in more balanced and accurate information regarding adjacent timber sales. Some discussion of timber sales was retained as they are pertinent to the historical context of land use in the area and its potential effect on Monument resources through such impacts as edge effects and forest fragmentation. We did not extensively discuss "positive contributions generated by sound forest management" because, except for the planned management of LSRs, it was not clear what role such management played in the main focus of the GMP, the prevention and mitigation of human impacts on park resources.

4. Several alternatives were presented rather than an all or nothing scenario. In addition, further comments were added to alternatives that were considered but rejected, such as the expansion of the Monument by several tens of thousands of acres, and the removal of buildings from the Monument. Based on these alternatives considered but rejected, the alternatives seriously considered represent a modest plan of changes to the status quo that will better protect park resources.

5. A simple memorandum of understanding between the SNF and the NPS has not been adequate in the past in protecting scenic viewsheds, mitigating edge effects and high road density, and preventing increased turbidity in the public water supply.

3 sales and the Siskiyou National Forest seem biased. We question whether articles such as "Siskiyou Ecosystem Joins List of Most Degraded"and "How Many People Were Arrested Defending the Forest?" have any scientific value and whether they should be included in a planning document such as this. There is no discussion as to the positive contributions generated by sound forest management.

4 It seems that the Park Service approach creates an all or nothing scenario. The Minimum Requirements Alternative might not incorporate the expansion of 3,310 acres, but maybe should incorporate needed maintenance, capital improvements, water and sewer systems and protection of the caves themselves. It is either a big plan of changes or the status quo.

We believe that it is unlikely that the Park Service could run the Caves tours better and at less cost than the private concessionaire. The National Park Service controls the Oregon Caves Company through a contract. For decades this has been a private business that has, for the most part, been run well. We believe that the concessionaire should continue to operate as it has in the past under a contract satisfactory to the Park Service's management objectives.

5 In conclusion, a simple memorandum of understanding between the Siskiyou National Forest and the National Park Service regarding land management and protection around the Monument has been adequate in the past, and would continue to be a workable arrangement. It would avoid an unnecessary layer of federal bureaucracy, that is of the Park Service performing the same functions as the Forest Service. It is important to protect the National Monument. The National Park Service has done its job well in the past as has the Siskiyou National Forest. We support Alternative A with modifications as discussed.

Sincerely

L-L Phillippi

Lincoln Phillippi
Rough & Ready Lumber Company

COMMENTS

L-201

March 12, 1998

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

Mr. Craig W. Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

RE: Draft General Management Plan and Environmental Impact Statement

Dear Mr. Ackerman:

Southern Oregon Timber Industries Association (SOTIA) is in receipt of your DRAFT General Management Plan and Environmental Impact Statement, dated December, 1997. SOTIA is 90-member trade association of the forest products industry whose membership includes loggers, primary and secondary manufacturers of wood products, timberland owners and businesses that supply goods and services to the forest products industry. Several of our members are located in Josephine County and are heavily dependent on federal timber supply for their livelihood. These businesses are also major employers in Josephine County and contribute significantly to the local economy by providing employment, purchasing local goods and services and through the payment of taxes.

101

Southern Oregon Timber Industries Association is opposed to any expansion of the Oregon Caves National Monument Park boundaries. If forced to choose one of the Alternatives listed in the DRAFT, SOTIA would vote for Alternative A. SOTIA's position is that a revised Alternative A should be drafted to incorporate some of the necessary infrastructure improvements that can be justified as cost effective, such as rehabilitation of the Chalet and Chateau buildings. This we would label as a "Minimum Requirements Alternative". We view Alternative B, currently listed as the "Minimum" alternative as misleading. Alternative B may be the "Minimum" in the eyes of Caves staff, but it certainly is not in the eyes of the forest products industry located in Josephine County.

1 Ostensibly, the preferred alternative, Alternative C: Enhanced Protection of Monument Resources and Visitor Experiences, has been nominated as such because it will provide better protection of the water supply to the Monument and also protection of viewsheds. These are both specious arguments masking a desire to expand the Park boundaries. Public water supply to the Park is already sufficiently protected by Siskiyou National Forest ownership of the headwaters area. Viewsheds are already protected by the designation of most of the surrounding National Forest in a Late Successional Reserve status and by the photographic evidence shown in the DRAFT document. Neither the argument to protect the public water supply nor the need to protect the viewshed from intrusive forest management activities on surrounding lands can be sustained.

RESPONSES

Letter 34: Southern Oregon Timber Industries Association

1. The National Park Service does not believe that arguments used in selecting our preferred alternative are deliberately deceptive, as the term specious implies. Most of the arguments and assumptions have been laid out fairly explicitly in the revised GMP/EIS.

2. The proposed expansion would better protect the Monument by offering increased viewshed and edge effect protection and the control of exotic plants that may result from thinning and fuel breaks in LSR's. Some of the problems with the current water supply was documented in the draft GMP, including the increased turbidity caused by road failure. In addition, giardia was discovered in the Lake Creek water intake in the winter of 1998. Having our water supply intake under Park Service administration would better protect the water intake from possible contamination by cryptosporidium and giardia from cows and from possible contamination of giardia from people camping directly beside the Bigelow Lakes.

3. Modifications have been made in the wording of logging activities in the final GMP/EIS.

4. Please see the Environmental Consequences chapter, Socioeconomic section in Alternative C.

5. It is true that some of the threats to the Caves is from human visitor use and the unintentional introduction of organic matter. However, the Park Service is mandated to protect surface resources as well. A proposed expansion of the Monument does not imply that the NPS will not actively manage visitors to reduce impacts to the cave.

2 **The water issue:**
The staff preferred Alternative C, talks about how "greater protection would be afforded to the upper Lake Creek watershed" through a Park boundary expansion (page 46). What is lacking in this DRAFT analysis is any detail as to the problems existing with the current water supply. Why would Park administration improve the water supply? If grazing is impacting on the current water situation, it is not documented in the Alternative C analysis. Furthermore, if measures are necessary to improve water quality, why not describe the needed improvement and request that the necessary actions be implemented by the current land manager, the Siskiyou National Forest? SOTIA suspects adequate protection of Lake Creek is already provided by the Siskiyou National Forest through either Late Successional Reserve status surrounding Lake Creek or through a Riparian Reserve designation of the acres immediately adjacent to Lake Creek.

3 **The viewshed issue:**
SOTIA finds the viewshed argument put forth by staff as a reason for Park expansion as particularly objectionable. The entire tone of the discussion surrounding the active management of our renewable natural resource, timber, is negative. We suggest that significant modifications be made in the wording of logging activities in the DRAFT.

102

The Siskiyou National Forest under the President's Northwest Forest Plan has reduced the annual programmed harvest from 160 Million board feet to 24 Million board feet. The Siskiyou is now managing less than 8% of the 1 Million acres within the forest for timber production. If visitors to the Caves National Monument are questioning forest management practices, these are the facts the Caves staff should be stating.

4 The DRAFT goes to great length to alledge that timber harvesting on lands surrounding the Monument "may adversely affect the quality of the visitor's experience" (page 106). Does the Caves staff also feel that advocating against timber management on the Siskiyou National Forest may also adversely affect the quality of life for the citizens of Josephine County if further reductions in timber harvesting and management are a result of the proposed boundary expansion effort?

There is no discussion in the DRAFT of the beneficial aspects of timber management on the Siskiyou lands surrounding the Monument. For example, the discussion of the Sugarloaf Timber Sale, on page 107, fails to mention that the timber sale objectives were to: Maintain long-term site productivity; promote natural regeneration; reduce wildfire risk; maintain uneven age structure; maintain roadless character of the land; and develop old-growth structure. We seriously doubt if visitors to the Monument can visually detect the Sugarloaf site from within existing Monument boundaries, nor that a visitor can even detect that the Sugarloaf area had harvesting occur.

The DRAFT discussion of the Buck Whiskers Timber Sale (page 107) does not mention that one of the primary beneficiaries of this thinning operation will be the Monument itself because of the reduced likelihood of catastrophic fire moving into the Monument grounds from an outside ignition site.

The China Left Timber Sale discussion on page 107 of the DRAFT is another example of biased writing that does not provide fair coverage of the issue of timber management and the resulting benefits to the local community. The DRAFT fails to note that units 2, 4 and 5 of China Left, those closest to the Monument, were thinning units where 65% of the standing volume per acre was retained in each unit.

Finally, we wish to point out the very photographs the DRAFT includes between pages 114 and 115 fail to substantiate any negative visual impacts. If visitors to the Caves National Monument wish "pristine" views of forested areas we suggest that the Caves staff direct the person inquiring to the nearby Kalmiopsis Wilderness (Siskiyou National Forest), Wild Rogue Wilderness (Siskiyou National Forest), Siskiyou Wilderness (Klamath National Forest), Smith River National Recreation Area (Six Rivers National Forest), Sky Lakes Wilderness (Rogue River National Forest), Red Buttes Wilderness (Rogue River National Forest), Crater Lake National Park, Rogue Umpqua Divide Wilderness (Umpqua/Rogue River National Forests) or the Mountain Lakes Wilderness (Winema National Forest). All of these wilderness areas, covering thousands upon thousands of acres, where no forest management takes place are all within a few hours drive of the Caves National Monument.

103

5

Summary:
In conclusion, Southern Oregon Timber Industries Association does not believe a substantive case can be made for the expansion of Monument boundaries. The water supply and viewsheds are already adequately protected by Siskiyou National Forest management. Limited forest management operations on surrounding lands will most likely benefit Park protection from potentially disasterous wildfire in the future. If a case can be made for Monument facility improvements, we would carefully review such information. It seemed apparent to SOTIA from our attendance at the Grants Pass City Council Chambers presentation and slide show on February 10, 1998, that the greatest immediate threat to the Caves is continuing degradation to the caves themselves from human visitor use and the unintentional introduction of organic matter into the caves (pages 7 and 8).

SOTIA believes Alternative A is the logical choice, with a modification of limited improvements to Monument physical structures.

We thank you for this opportunity to submit written comments on the DRAFT General Managment Plan and Environmental Impact Statement. If we can answer questions raised by our comments, please feel free in calling.

Sincerely,

David S. Hill

David S. Hill
Executive Vice President

COMMENTS

L-208

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

March 11, 1998

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Re: Draft General Management Plan and EIS, Oregon Caves National Monument

Dear Craig,

Thank you for providing the opportunity to learn more about this project at the Open House on February 9. The Park Service staff were very helpful, and wrote down quite a few of my comments at that point. This letter provides additional comments on the proposed expansion of the Oregon Caves National Monument.

I basically support Alternative C, which meets the Park Service's goals and policies better than any of the other alternatives. Please consider the following points which support Alternative C with some changes:

1. Boundary expansion not adequate
2. Caves interpretive services
3. Limiting visitation, restoration
4. Road closure, shuttling
5. Protecting the healthy Port Orford Cedar

1. While I do support the addition/transfer of 3,310 acres of National Forest to the Park Service, more land must be transferred to protect all of the Caves resources: water, wildlife and their habitats, geological formations...

History has shown that the lands managed by the Park Service are in better condition than those managed by the Forest Service and Bureau of Land Management. A cumulative impact assessment of the area would show much logging, road building and mining activities, which have many negative impacts on the ecology of the Caves region. The large mammals and forest carnivores that live in the Caves region need large corridors to access adjacent Wilderness and wild lands. By including all federal lands in the upper Grayback/Sucker Creek watershed, approximately 48,000 acres, we could insure the conservation of a water source as well as restore the fragmented "islands" of habitat surrounding the Monument. Of course, it would be even better if we could transfer all Public Lands from the Department of Agriculture to the Department of Interior (Park Service).

2. I look forward to the day when the Oregon Caves tours are lead by knowledgeable scientists of ecologists who can explain the unique geology of the area to myself, my family, visiting relatives...

104

RESPONSES

Letter 35: Cave Junction Sierra Club

1. The GMP would be amended to include a traffic signal only if other options are not successful. This would include posted signing and other measures.

2. Full consideration would be given to include this interpretive topic when site interpretive planning is done for trailhed areas and other media.

I have always been offended by the Disneyland-like approach of the current tours, not realizing that the Park Service contracts out this service. Our National Monuments are precious- and what we teach visitors affects how they care for our Public Lands. The Park Services goals of protecting, restoring, and allowing for public enjoyment could be better promoted by Park Service employees, not concessionaires whose goal is to make a profit. By providing interpretive services, the Park Service could reduce direct human impacts (from negligence to vandalism) on the Caves and their inhabitants, nurture an appreciation for natural wonders, and foster an educational experience for children and adults. There are many natural wonders such as the jaguar and bear bones, rare geological formations, and the Big Tree which offer great learning opportunities.

3. There should be a limit to the amount of visitors to the Caves. This is a National Monument, not an amusement park. It should be of utmost concern to maintain a healthy Caves ecosystem. Winter/seasonal closures are appropriate to give the Caves a break from human impacts. Restoration projects could occur (and probably already do) during seasonal closures.

1 4. To decrease traffic on Highway 46, shuttling should be provided during the popular summer months. RV's and campers should be required to use these services. Also, instead of installing a traffic signal, the road between the parking lot and the chalet could be closed to vehicles during peak daytime hours to enable safe pedestrian traffic. Golf carts could be used to shuttle handicapped people to the Chalet area. Over night guests could arrive during off-peak hours.

105

2 5. Education and instruction should be provided at trail heads so that POC root disease is not spread by hikers in the area around the Oregon Caves, trails and nearby campgrounds. This beautiful and important species should be offered special protection in this southern range.

Thank you for your consideration for all species that utilize the Oregon Caves region.

Sincerely,

Debbie Lukas, Mining Chair

cc. NPS, Seattle, WA

L-203

March 10, 1998

Craig Ackerman
Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Craig,

I am writing to you to express my support for Alternative C and the expansion of the Oregon Caves National Monument. The monument and adjacent watersheds, provide a refuge for sensitive, threatened and endangered species such as bats, terrestrial salamanders, forest carnivores and rare plants. Due to extensive clearcut logging on BLM lands adjacent to the monument, this area remains a critical oasis of dispersal, rearing and foraging habitat.

An ecosystem such as the Oregon Caves Monument, is a complex web, full of infinite interconnections that extend both above and below the ground surface. Past logging practices in the area, if continued, would kill the cave ecosystem, by undermining the soils, and flooding the karst zone with sediment filled runoff. If the cave ecology was to change, bats, salamanders, and several rare plants would perish.

I would encourage you to conduct an extensive survey of all sensitive, threatened, and endangered species both above and throughout the cave-karst system. I would also encourage you to protect as much of the karst system as possible to the North, and extend the boundary South to the logging road for fire suppression. Protection of bat species, especially while hibernating and roosting, should take precedence over guided tours. I support an interpretive center, as long as the focus is to teach people about cave ecology, and the value of protecting the cave resource. I think that the NPS would be in the best position to do both, by conducting tours while managing the cave resource.

Thank you for reviewing my concerns, and please keep me advised of any changes to the cave management plan.

Yours Truly,

Kyle Haines

For/Shasta Group Sierra Club
Shasta Area Grotto (NSS)

Letter 36: Shasta Group Sierra Club

Thank you for your comments.

COMMENTS

L-215

March 5, 1998

Kettle Range Conservation Group
P.O. Box 150
Republic, Washington 99166
509-775-2667

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

Oregon Caves General Management Plan
National Park Service
Columbia Cascades Support Office
909 First Avenue, Suite 500
Seattle, Washington 98104-9882

Re: Oregon Caves National Monument

Dear Director,

On behalf of the membership and board of the Kettle Range Conservation Group, representing over 1,500 registered voters in eastern Washington, I write to express support for protecting and preserving the Oregon Caves National Monument. KRCG's membership is greatly concerned with the future management of this incredible national treasure.

107

1 With increasing use and a burgeoning Northwest population, the Park Service must expand the area of the Monument to provide for future need. KRCG urges you to expand the Park to include all federal lands in the Sucker and Grayback Creek watersheds. This expansion will ensure continuity in management, protecting visual and watershed environments, while providing for terrestrial and aquatic species needs. Existing and future management must protect this valuable resource. Current livestock grazing in the area is not compatible with public recreation and watershed conservation.

We strongly urge you to make inclusion of Sucker and Grayback Creek watersheds in the Monument boundary your highest priority. We look forward to supporting your efforts to expand the Oregon Caves National Monument.

Sincerely,

Timothy J. Coleman
Executive Director

RESPONSES

Letter 37: Kettle Range Conservation Group

1. Please see end of Alternatives chapter, Actions Considered but Rejected, item 7, Other Boundary Configuations.

MAR 12 1998 6585

Klamath Forest Alliance
P.O. Box 820, Etna, CA 96027
ph. 467-5450 fax 467-3130 email: Klamath@sisqtel.net

Oregon Caves Management Plan
National Park Service
Columbia Cascades Support Office
909 First Avenue, Suite 500
Seattle, WA 98104-9882

March 9, 1998

To whom it may concern:

As a representative of the Klamath Forest Alliance, I am writing with regards to the Oregon Caves National Monument Draft Management Plan and Environmental Impact Statement. Please consider these comments and place them in the formal administrative record.

First, I would like to compliment you on the very impressive DGMP. We appreciate the care that you took to consider the monument as a part of the larger Siskiyou ecoregion, and to include the political, historical and cultural context. These considerations are very important, but are often overlooked when land management decisions are being made. Further, the biological uniqueness of the monument and the area that surrounds it is honestly recognized in the DGMP. On page 76 it is stated that "The monument lies within a forest region perhaps more diverse and complex than any other in the West. The monument's forest types are not well represented elsewhere in preserve status." This is one of many encouraging indications throughout the document that the value of the area is not being underestimated in the process of deciding its fate.

However, based on the information in the DGMP about the important water resources, old-growth dependent animal species, and unique vegetation of the land surrounding the Oregon Caves National Monument, it is clear that *the preferred alternative is insufficient* in that it only addresses the minimum requirements of protection. The recent logging that has occurred on the land immediately surrounding the monument is enough proof that its designation as a Late Successional Reserve is not adequate protection for its water resources and plant and animal life. It is important that this area be given *maximum* protection so that it might survive for future generations. We suggest that the monument's boundaries be expanded to include all federal lands in the Sucker/Grayback Creek watershed, making the Oregon Caves National Monument a healthy 48,000 acres.

Thank you for your efforts to further protect the exceptional Siskiyou ecoregion.

Sincerely,

Adrienne Reed Storey

Adrienne Reed Storey

108

Letter 38: Klamath Forest Alliance

Thank you for your comments..

L-4

Jackson County Horseman's Association
P.O. Box 765
Medford, OR 97501

March 3, 1998

RECEIVED
MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

Oregon Caves General Management Plan
National Park Service
Columbia Cascades Support Office
909 First Avenue, Suite 500
Seattle, WA 98104-9882

Dear Sirs:

Please consider this letter a response to your request for input regarding the future of Oregon Caves National Monument. As a saddle club representing approximately 100 members, we are concerned with the availability and maintenance and continual use of the horse trails in the proposed area of acquisition.

Our group is primarily a riding club and use all trails in Jackson and Josephine Counties and surrounding areas, and cannot express strongly enough our desire that the trails remain available. Enclosed you will find a copy of our recent newsletter. Hopefully it will be apparent that we are a very active club.

We would like to be kept informed of any future planning newsletters and future monument activities.

Yours very truly,

Peggy J. Pitt 3/9/98

Peggy J. Pitt, President

Enc.

109

Letter 39: Jackson County Horseman's Association

Please see NPS response to Letter 43 and 41.

L-48

Clackamas County Riding Clubs Association
17342 S. Fenfici Rd., Oregon City, OR 97045

February 24, 1998

RECEIVED
MAR 02 1998
OREGON CAVES
NATIONAL MONUMENT

Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Attention: Superintendent

Dear Sir:

The Clackamas County Riding Clubs Association, an equestrian organization consisting of four saddle clubs with approximately 175 families, is opposed to the proposal for the expansion of 3310 acres of public lands to be annexed to the Oregon Caves National Monument.

We would very much like to receive additional information as to the plans and management anticipated by this expansion.

Very truly yours,
Clackamas County Riding Clubs Association
Caroline M. Crader, Secretary

110

Letter 40: Clackamas County Riding Clubs Association

Thank you for your comments.

L-41

EASY GAITED HORSE ASSOC.
389 Summit Loop
Grants Pass, OR 97527
541-476-0905

Oregon Caves Monument
1900 Caves Hwy.
Cave Junction, OR 97523

Att: Mr. Craig Ackerman

RECEIVED
FEB 27 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Mr. Ackerman,

The following letter is to discuss the proposal of the future expansion of the Oregon Caves Monument.

Our club consists of forty members. This is not an individual's concern. This letter represents the view of all our members. Our concerns of your expansion are of two fold.

III

1. We would like the horse trials left open to horsemen. We tax payers have a right to that privilege. I'm sure when Theodore Roosevelt initiated the first National Park it was solely for that purpose, that all citizens enjoy our National Parks. At present the government already owns 75% of Oregon land and this move would minimize acquisition of private land.

1

2. Our second concern would be the 700% plus increase in land acquisition from 484 acres to 3794. The future fate of this land, we are afraid of, will land in the hands of the United Nations, taking away our sovereignty of the land that belongs to every citizen of the United States, which we as tax payers dearly paid for. If this be its fate we strongly object to its expansion.

I am sure you have received many comments on the issue and there are many more horsemen, hikers and bike riders with these concerns.

We would be pleased to receive an up date from you on the subject. We also hope that not only a choice few are the deciding factor on the issue.

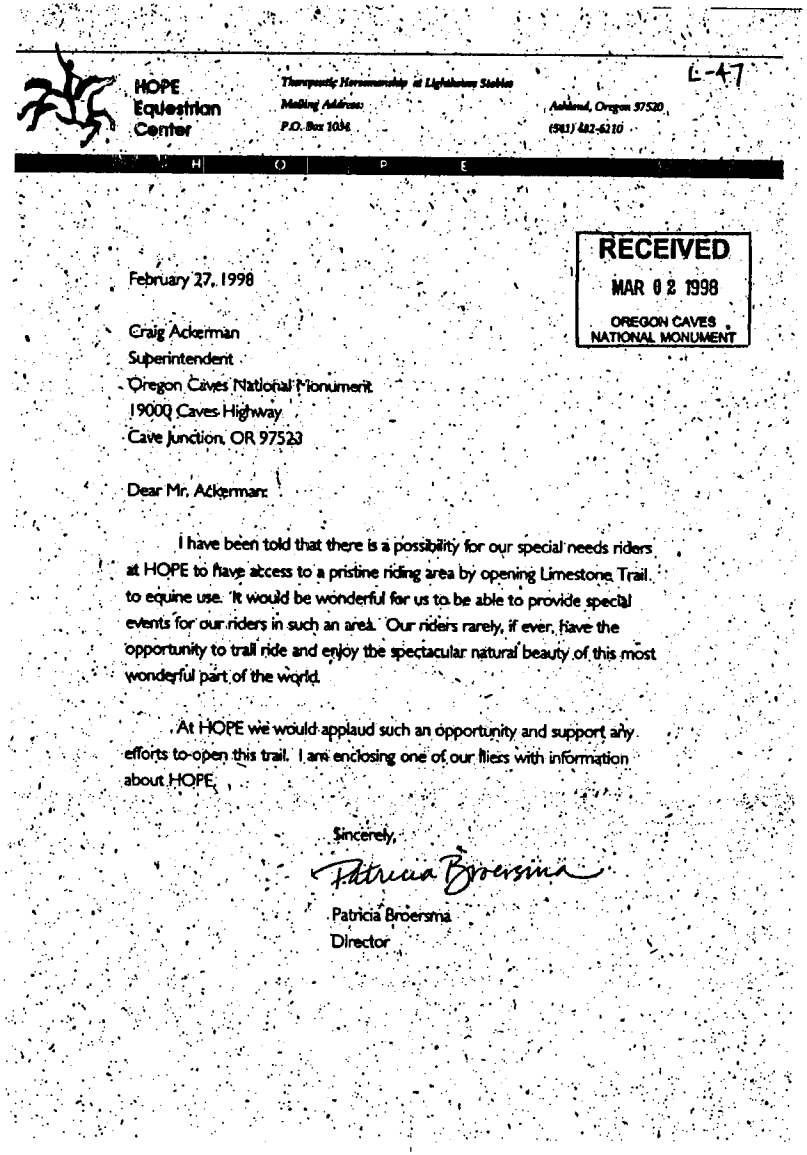
Respectfully yours,

Paul Kucharik

Paul Kucharik
Vice President
Easy Gaited Horse Assoc.

Letter 41: Easy Gaited Horse Association

1. Horse use would be permitted within the expanded Monument on those trails which have traditionally been available for horse use. This would include Lake Mountain Trail, Meadow Mountain Trail, and Limestone Trail. The NPS would work closely with horse user groups on these and other issues. Language has been added to the final GMP addressing horse use in the Alternatives chapter.



HOPE Equestrian Center

Therapeutic Horsemanship at Lightshadow Stables
Mailing Address:
P.O. Box 1034
Ashland, Oregon 97520
(541) 482-6210

L-47

H O P E

RECEIVED
MAR 02 1998
OREGON CAVES
NATIONAL MONUMENT

February 27, 1998

Craig Ackerman
Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Mr. Ackerman:

I have been told that there is a possibility for our special needs riders at HOPE to have access to a pristine riding area by opening Limestone Trail to equine use. It would be wonderful for us to be able to provide special events for our riders in such an area. Our riders rarely, if ever, have the opportunity to trail ride and enjoy the spectacular natural beauty of this most wonderful part of the world.

At HOPE we would applaud such an opportunity and support any efforts to open this trail. I am enclosing one of our fliers with information about HOPE.

Sincerely,

Patricia Broersma

Patricia Broersma
Director

Letter 42: HOPE Equestrian Center

Thank you for your comments.

COMMENTS

March 3, 1998

Superintendent, Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Mr. Ackerman:

In the public comment letter from the IV Chapter of the Back Country Horseman Organization sent on 2/16/98, an opinion was expressed on the issue of cattle access.

At this time we would like to address only equestrian issues and those which pertain to our opportunity to enjoy public lands.

113 Attached is a revised letter, replacing the one sent 2/16/98. The new letter is one which feel we can all support.

Thank you for taking the time to read our letters and consider our opinions on the proposal before you.

Sincerely,

Joy Trevey
Legislative Director
Illinois Valley Chapter
Back Country Horseman of OR

RESPONSES

Letter 43: Illinois Valley Chapter of Backcountry Horseman

1. A new map showing horse trails, Figure 38, has been included in the final GMP/EIS.

2. New language has been added to address these concerns in the Alternatives chapter , Alternative C, under the heading Recreational Resources.

February 16, 1998

Craig W. Ackerman
Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

We believe "Proposal C" provides the protection for the Oregon Caves National Monument's watershed and the sensitive ecology of the area. The present proposal allows reasonable access to the general public, including unrestricted continual use of established horse trails.

1 The watershed area and sensitive ecology appear to be well-defined and identified, but the horse and hiking trails are not clear on any maps on the main draft (Proposal C).

We would like these trails listed and located on the final map and assurance that they will remain open for horses, mules, llama and pack animal travel.

The trails listed below are those that will fall within the expanded boundaries of the Oregon Caves National Monument.

1. Lake Mt. Trail
2. Meadow Mt. Trail
3. Limestone Trail (see attached letter)

114

We request that a trailhead be established at Horse Mt. Rd. [4614], close to, if not at, the intersection of roads [4614], [047],and [048]. This trailhead would be on the boundary of OCNM. It would provide access to the Limestone trailhead. For the safety of all equestrians, we would request the extension of the Limestone Trailhead to begin at the intersection of the aforementioned roads. This would also provide adequate parking for trucks and horse trailers.

We also request that the small segment of the Limestone Trail that passes through the southeast corner of the existing Oregon Caves National Monument be reopened to equestrian travel. This would provide the closest, safest, and most enjoyable route possible, to the beautiful Bigelow Lakes Area for the Physically Challenged (ADA) equestrian. Not all of these individuals can spend many hours in the saddle and this ride would be a dream come true.

2 We feel that the National Park Service needs to address potential problems and concerns before they develop. For example, should the Health Department, or whomever, determine that horses and other pack animals create or add to a health hazard by passing through and drinking from Lake Creek or it's headwaters. This potential problem could be addressed with a plan to build bridges, such as dirt-covered culverts over Lake Creek at the two crossings of the Meadow Mountain Trail. This alternative, or others, need to be addressed in-

2 stead of closures to important trail systems as a solution. As horsemen and women, we would appreciate knowing what the NPS consider as effective alternative to trail closure. Horses and other packing stock should not be prohibited from drinking from the streams or lakes in this area unless water troughs are available, filled with clean, fresh ample water.

We also feel that the Bigelow Lakes area should be protected from the dumping of trash and vandalism by the closure of Road [070] and converting it to a riding and hiking trail. There is also a need for the establishment of a trailhead at Pepper camp or approximately 1/2 mile southeast of Pepper Camp, on Road [079] near the new monument boundary that would connect with the new trail converted from Road [070].

A Horse Camp with corrals at either site would be a big plus; portable toilets another big plus. Trucks pulling horse trailers need lots of room to turn around and space between rigs is very necessary.

We also feel that trail maintenance should be a part of the OCNM budget. Monies collected from tourism and sources need to be made available to build new trails and repair and maintain existing ones. The trails should be of good quality throughout the monument, not only for hikers but horse and pack travel as well.

We also see a need for trail markers, such as the Pacific Crest Trail Assoc. uses. These small metal markers are not targeted for vandalism as are large plaques. They also are easily recognized by most people.

Trail markers give credit where credit is due to those who volunteer their time and resources to provide this recreational opportunity. It's a well-known fact among horse people that hikers are not aware of the efforts by horse organizations to open and keep open many trail systems. We believe this recognition of effort by the markers would help this awareness as well as generate good will among back country trail users. Possibly even squelch some of the hostilities that are occasionally met out on the trail. The goal is to encourage and bring a spirit of cooperation and understanding.

Also, this would motivate more organizations to adopt trails if they could have some recognition for their work.

Trail markers with directions are a nice touch. If vandalism wasn't such a problem, the history of the trail and the areas traveled through could be a special treat for many travelers.

It would be to everyone's advantage, hiker and equestrian alike to have a pamphlet available at either the Visitors Center, the OCNM, with a permanent sign at trailheads or parking areas that denote trail etiquette.

COMMENTS

RESPONSES

On behalf of the Illinois Valley Chapter of the Backcountry Horseman, we appreciate your time and consideration in regards to these matters.

Lorna DeVecchio
State Representative Director
Illinois Valley Chapter
Back Country Horseman of OR

Joy Trevey
Legislative Director
Illinois Valley Chapter
Back Country Horseman of OR

HIGH DESERT TRAIL RIDERS
Back Country Horsemen
P.O. Box 7766
Klamath Falls, Oregon 97603

L-562

RECEIVED
MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

March 12, 1998

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Mr. Ackerman:

I'm writing in response to the Draft General Management Plan (DGMP) for the Oregon Caves National Monument (OCNM). The following is the opinion of the High Desert Trail Riders Back Country Horsemen of Klamath Falls, Oregon.

By way of introduction, we are a group of pro-active, concerned horsemen and women based in Klamath Falls, Oregon. Our membership is slightly over 100 people, mostly within a 50 mile radius of Klamath Falls. Our group has been in existence since the late 70s and was incorporated under the Backcountry Horseman banner in 1993 due to similar philosophy and goals.

We will further explain the terms "pro-active" and "concerned". We are interested in keeping the back country open to stock use and encourage all users to conduct themselves in a manner that leaves the least amount of impact from their visit.

In evidence of this, we are hosting the 11th annual Horsepacking & Wilderness Skills Clinic on May 16 and 17 at the Klamath County Fairgrounds in Klamath Falls, Oregon. We cordially invite you and your staff to come over, have some fun, and see the various programs and messages that we are trying to promote to the general public. We are supported by the Winema National Forest and a number of other forests and agencies have booths - BLM, Crater Lake National Park, Fremont National Forest, Willamette National Forest, etc. We have supported the above agencies with a number of volunteer projects through the years, both in labor and materials. Some examples are trail and trailhead maintenance, trailhead design, corrals and gates at trailheads, water facilities, packing fish for stocking wilderness lakes, riparian fence maintenance, etc. We also have provided monies to fund various programs, such as H.O.R.S.E.S. in Scott's Mill, OR. This venture provides an opportunity for physically challenged individuals to interact with stock and actually ride in both non and wilderness environments.

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Letter 44: High Desert Trail Riders, Back Country Horseman

See NPS response to comment Letters 43 and 41.

Now that we are acquainted, I will get to the details of addressing the DGMP. The Klamath Falls chapter takes a sometimes controversial stance in that we use and appreciate wilderness but are firm supporters of the multiple use concept in land management. Therefore, we can see no reason to transfer land from the Siskiyou National Forest to the National Park Service. Parts of the reasoning is the loss of recreational opportunity - namely hunting. Another part of the reasoning is that we can see nothing wrong with the capabilities of the Forest Service in managing the land surrounding the existing monument.

We've examined the "expanded issues" and wholeheartedly agree that the water resources need protection. However, we propose a different method from exclusion of cattle. Once you remove the "lawn mower" the range will become decadent and less desirable to many species of wildlife. We would suggest pasture rotation and earlier removal of stock from the area - early September, to allow fall rains to "green up" the meadows. In areas of critical importance, riparian fencing combined with limited grazing should accomplish your goals.

Another area under "expanded issues" would be our option on management and control of fire. If the lands surrounding the monument were not transferred to OCNM management, you could do the following: carefully plan and implement a program of salvage harvest to remove the fuel loading problem. There are a number of "environmentally sensitive" logging systems that could be utilized. This could be carefully orchestrated to educate the general public on the positive side of selective harvest.

We have examined the four alternatives and are concerned that none address specifically stock use in the DGMP. Some of our members are familiar with the Bigelow Lakes area and the interconnecting trails linking the Grayback Mountain area and Red Buttes Wilderness to the Oregon Caves National Monument. We would ask that stock use be specifically addressed as an acceptable use on all trails. We also concur with the Illinois Valley Chapter of Backcountry Horseman that we would appreciate re-opening any closed trails.

The "preferred alternative" as well as alternates "B" and "D" call for a substantial outlay of capital for both expanded facilities, programs and also annual operating expenses. We are very concerned on how this revenue would be derived. The budgets with other agencies that we interact with are being severely cut - especially recreation.

In conclusion, we are having difficulty picking an alternative. The alternative that is the best fit for our opinions is alternative "A", the "No Action Alternative". However, we still strongly feel that you should address the issue of water quality and fuel loading under our solutions. We also again ask for your consideration to maximize stock use as a listed, acceptable practice in the Oregon Caves National Monument plan.

Thank you for your consideration. Hope to see you May 16 and 17, 1998 at the Horsepacking and Wilderness Skills Clinic here in Klamath Falls.

Sincerely yours,

Mike Garrett
Board of Directors for
The High Desert Backcountry Horsemen
Klamath Falls, OR 97601

cc: Mike Lunn, Supervisor
Siskiyou National Forest
P. O. Box 440
Grants Pass, OR 97528-0242

Eric Cedarstam
Legislative Coordinator for Backcountry Horsemen of Oregon

Bobbie Ann Beller, President
Illinois Valley Backcountry Horsemen

Mike Letsch, President
High Desert Trailriders Backcountry Horsemen

COMMENTS

Author: SssKnutson <SssKnutson@aol.com> at NP--INTERNET
Date: 3/12/98 6:28 PM
Priority: Normal
TO: ORCA Administration at NP-ORCA
Subject: Oregon Caves GMP

Superintendent,

I would like to speak further about the proposed changes to the GEneral Management Plan. I am in favor of Alternative C but would like to see an entry that spoke more specifically on the subject of cave security. The policies and hardware in place at this time I think are quite appropriate--the magnetic lock system, access points carefully gated or obstructed, and unsupervised activities in the cave prohibited. But even relatively recently this was not the case and the cave suffered for it. I would like to see a deliberate statement of such policies and techniques so that future administrators might not slip back to a state of lesser security. 1

Steve Knutson
Director, Klamath Mountains Conservation Task Force
National Speleological Society

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MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

RESPONSES

Letter 45: Steve Knutson

1. Cave security is a critical element of protection of cave resources. A physical security review will be incorporated into the Monument's Resource Management Plan and Standard Operations. Incorporation of specific elements of security are more appropriate for those operational plans and will not be included in the GMP.

Author:
Date: 3/13/98 6:04 PM
Priority: Normal
TO: ORCA Administration at NP-ORCA
Subject: Comments on Oregon Cave Management Plan

Dear Sir:

I would like to express my support for Alternative C of the proposed Oregon Caves General Management Plan. My reasons for preferring this option are twofold:

1) Greater protection for the karst upstream of the cave, and

2) Improvement in the quality of the tours and training of tour guides under NPS supervision.

1 A significant portion of the flow of the River Styx is not accounted for by drainage in the cave or sinking streams above it. It appears likely that the cave is draining parts of the mountain currently outside the monument. Activities in this area, if not controlled, could have a detrimental impact on the cave system.

I have heard several reports of problems with the current tours, including tour guides intentionally disturbing bats. Taking over the tours from the Concession would certainly improve the quality of the tours, both in terms of their impact on cave life and in the impression they leave on visitors. These short tours are for many visitors the first contact they have with caves and cave life. A poorly run tour by a careless guide can cause problems well beyond the immediate impact on the Monument.

I appreciate the opportunity to comment on the draft plan, and look forward to seeing how the plan evolves over time.

Respectfully,

Jim Hildebrand
Diablo Grotto-NSS

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MAR 13 1998
OREGON CAVES
NATIONAL MONUMENT

Letter 46: Diablo Grotto

1. Since the main water flow in the main cave occurs along the strike of the bedding planes/foliation (Droege, 1998), it seems reasonable to suppose that some water in marble areas from outside the Monument to the north is entering caves or proto-caves in the Monument along bedding planes. However, upper Cave Creek and its drainage area is the primary recharge component of River Styx in Oregon Caves, as demonstrated by ground-water traces, similar concentrations of the major ions in upper Cave Creek and the cave, the lack of high silica and magnesium ionic concentrations in cave water (indicating that serpentine and quartz diorite areas off the Monument are not a major water source) and the sufficiency of precipitation minus estimated evapotranspiration (based on chloride ratios and studies in similar habitats) within the likely drainage basin to supply the observed flow from the cave and from other springs.

L-

MAR 12 1998

WILLAMETTE VALLEY GROTTO
a chapter of the National Speleological Society

Oregon Caves General Management Plan
National Park Service
Columbia Cascades Support Office
909 First Ave, Suite 500
Seattle, WA 98104-9882

Dear Mr Brandt,

After reviewing the draft management option plans for the Oregon Caves National Monument, the Willamette Valley Grotto chapter of the NSS has endorsed alternative C.

The NPS has consistently shown quality guide interpretation on other park service caves. Further, the assessment of the extent of Oregon Caves in the limestone/marble structure encourages the expansion of the monument boundaries to preserve this unique resource.

Sincerely,

Thomas Kline
chairman of the WVG

Letter 47: Willamette Valley Grotto

Thank you for your comments.

Terry Merrill JAN 30 1998

RECEIVED
FEB 9 1998
OREGON CAVES
NATIONAL MONUMENT

Oregon Caves General Management Plan
National Park Service
Columbia Cascade Support Office
909 First Ave Suite 500
Seattle, WA 98104-9882

To Whom It May Concern:

This letter is in response to the four plans proposed for the Oregon Caves National Monument. I favor Plan B over Plan C for two main reasons that I feel out weigh the other obvious benefits of Plan C. These are the use of park personnel as tour guides and the elimination of public lodging. I was an Earthwatch volunteer two summers ago and am therefore familiar with the situation and the specific problems. I visited a cave in South Dakota run by the Park Service last summer and was very impressed. The aura was far more appealing with educational and environmental issues dominating the entire park area. People seemed very responsive to the professionalism of the tour and the guides. The area had other recreational activities without supplying lodging. There was a gift shop and a small machine canteen. I'm not sure who operated these but they had the same aura as the rest of the park. I feel that this system was the best I've seen, and I visit caves whenever I travel so I've visited a large number of them.

One further issue that concerns me is the clear cutting. I know and understand the need for logging, but there are other methods that have less environmental impact. Is there anything you can do about this? When I hiked up to the big tree and looked around, the scars on the land were appalling with environmental consequences I only dimly understand. This is a very beautiful area, and I wish you the best in its management. Please keep me on your mailing list for future planning but not activities since I will probably not be in the area again in the foreseeable future.

1 I know you have probably had more suggestions for additional tours than you need, but I would like to add one anyway. I think a "kids only" tour that involved some crawling and little areas as well as being supplied with little hats with lights would provide a really good experience that the children would never forget. Also going someplace their parents can't will provide an opportunity for family conversation that is probably much greater and in more depth than an ordinary tour. I also think having people wear something over their shoes and clothes to lessen the lint problem and, as importantly, to dramatically increase awareness of the fragility of the cave environment. I understand the health considerations but the think the idea has potential.

Respectfully

123

Letter 48: Terry Merrill

1. The suggestion for special tours targeted for children is a good one that has been considered by Monument interpretive staff. Development of additional tours beside the standard one that traverses the entire length of the cave will be considered. The draft has been amended to reflect this.

   NPS has considered the use of protective coverings for visitors clothing while taking cave tours. However, the concept was not considered a practical solution due to highs costs and impracticability of requiring and providing specialized clothing for every visitor.

E-24

Author:
Date: 3/12/98 3:47 PM
Priority: Normal
TO: Roger Brandt at NP-ORCA
Subject: Enlarging Oregon Caves Monument & tour cuts

RECEIVED
MAR 12 1998
OREGON CAVES
NATIONAL MONUMENT

March 12, 1998

Superintendent
Oregon Caves National Monument
19000 Cave Highway
Cave Junction, Oregon 97523

Re: Oregon Caves National Monument Draft General Management Plan and Environmental Impact Statement

Dear Superintendent:

1 If you are going to cut back so drastically on the amount of tours and people in each tour, you would be well advised to start taking advance reservations. Otherwise you will have a monumental problem on your hands in the summer (tourist season). When we came in June last summer, we had to wait 40 minutes as it was, and we couldn't make a reservation ahead or we would have. Just a thought. A good one we think.

The Oregon Caves National Monument is very important ecologically, economically and culturally to southwest Oregon and the Siskiyou Mountains of the Klamath-Siskiyou Region. I support the proposed expansion of the Monument and returning the responsibilities for interpretive services and the caves tours to the National Park Service. This direction and action are critically important to the future of the Monument.

2 In order to protect the water resources of the Oregon Caves and the Monument facilities and to restore the watersheds surrounding the Oregon Caves, the Monument expansion should include all Federal lands in the Sucker-Greyback Creek Watershed. This would also in the near future provide expanded recreational, interpretive, scientific and educational benefits to public and the communities of Southwest Oregon and to the management and protection of the Oregon Caves. It is especially important that the Bigelow Mountain and Bigelow Lakes Botanical Area are included in the Monument and grazing and other activities, which are impacting the ecological, recreational and aesthetic values of the area, are discontinued.

3 In addition to protecting the ecological values of the Oregon Caves and its surrounding ecosystem, we feel that the emphasis of the Monument's Management Plan should focus on interpretive, educational and cultural service to the public. The commercial focus of concessionaire service should be to provide food services.

Thank you for your excellent outreach to the local communities. The Park Service has established a special relationship with this corner of southwest Oregon. We hope that relationship can be expanded with the physical boundaries of the Monument. The Draft EIS is excellent and will be very useful for future reference.

Gloria J. & Robert H. Ziller

124

Letter 49: Gloria J. Robert H. Ziller

1. A reservation system is a key element of the plan. Advanced reservations will be available at the Illinois Valley Visitor Center in Cave Junction or by telephone for day of sale. Persons arriving at the Monument without reservations will not be excluded from tours but will be limited to times with available vacancies.

2. See NPS Responses to General Comments # 5

3. One of the primary elements of the plan is expansion of interpretive opportunities. Concession services will still continue in the areas of food service, lodging and gift and merchandise sales. Additional NPS staff proposed in the plan will also be available to conduct other interpretive and environmental education programs, including outreach to local communities.

COMMENTS

L-32

February 17, 1998

RECEIVED
FEB 19 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Re: Oregon Caves National Monument Management Plan Alt. C

Dear Mr. Ackerman:

We are happy to see that a significant territorial expansion is planned in Proposed Alt. C. However, we strongly recommend an additional expansion to the south at least to Siskiyou National Forest road 048. This should incorporate part of the Limestone Trail into the Monument, where it should be. Much more reliable protection for the rare and botanically productive serpentine soils and the land through which the trail winds could then be expected. Also, the Mt. Elijah Trail should be entirely within the National Monument. The National Park Service should manage these trails. Coordination with the Siskiyou National Forest has not been and cannot be expected to be satisfactory. Their mission is so different. At the very least, we urge that Withdrawal Sections 15 and 16 be retained. Do not relinquish these to the Siskiyou National Forest.* 1

We strongly prefer that National Park Service Rangers operate and interpret the Caves. They should be knowledgeable in all interpretive themes listed on pp 88-89. If this service is to be contracted out, the NPS must at least directly supervise.

We have been very disappointed with the commercialism displayed in the Chalet and even in the Chateau. Let's have quality in the new facilities and their management!

125

RESPONSES

Letter 50: Myra Erwin

1. Thank you for your suggestion. The proposed Monument boundary under Alternative C would encompass much of sections 15 and 16 based on hydrography and topography. Some portions of those sections are not proposed in the expansion area, because lands to the south are in a different hydrographic drainage.

2

We expect that with appropriate and high quality exhibits and more professional management there will be an increase in tourism not only from Oregon but also from other states and foreign countries. The word gets around when people have a high quality experience!

Sincerely,

Myra Erwin

Myra Erwin

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* Under National Monument management, the Monument could protect itself from future mining and logging with their attendant noise, soil, water and landscape damage. Perhaps National Monument management could even prevent or reduce vandalism, trash and litter better than the National Forest does.

COMMENTS

Author:
Date: 3/13/98 12:02 PM
Priority: Normal
TO: Roger Brandt at NP-ORCA
Subject: orca-gmp

Dear Mr. Brandt:

My name is Brian McKennon and I live at 4373 Tami Lane, Central Point, OR 97502. I found out only yesterday that Mar. 13 was the last day to comment on the orca-gmp. That's why I am submitting my comments via e-mail.

While I wholeheartedly agree with the stated objectives of protection of cave resources such as watershed, viewshed, etc., the area of concern I would like to comment on is not really addressed specifically in any of the four alternatives.

I am an avid motorcyclist as well as an avid backpacker and naturalist. I stay on trails, do everything possible to minimize my impact both erosion and noise- wise, and ride responsibly. My main objectives are to get out and see some truly magnificent country.

I have motorcycled the watershed divide area from Grayback Mtn./O'Brien Ck. down to the Stugis Pk./Swan Mt./Green Valley area, and all points in between. Over the past ten years I have motorcycled in this area an average of five times per year and have taken a total of perhaps twenty different people through the area.

The Mt. Elijah/Bigelow Lakes area, including the road to Bigelow Lakes and surrounding trails are among the most scenic. Whether absorbed into the monument boundary or "protected" through cooperative agreement with SNF, I feel that any roads and/or trails currently open to motorized vehicle use should remain so.

The area currently seems to receive fairly limited use by hikers. I have seen other motorcyclists before but only once in ten years have I encountered a hiker on the Boundary trail or other neighboring trails. As I recall he was there just to protest the Sugarloaf sale. I also almost never see vehicles at the Sturgis Pk. and/or O'Brien Ck.trailheads. Therefore I feel that motorized recreation has historically been a relatively common use in the proposed monument expansion (or) SNF protected area.

I have, however, seen lots of ugly clearcuts, logging slash, relatively unsuccessful replantings, road washouts and landslides on SNF land in the area. I have also seen lots and lots of cows and cow excrement in wet surface water areas as well as trail erosion and additional excrement caused by equestrian use.

I always thought the entire Applegate/Illinois watershed divide area from the Red Buttes Wilderness area boundary north to Grayback deserved some sort of protection from logging, grazing and other harmful uses. The area has unique geology as well as some very interesting plant communities. It is one of the few places one can ride trail bikes in a relatively untouched old growth setting.

Off road vehicle use has a nasty reputation but in reality has little impact on surface water quality compared to the large scale effects of grazing and clearcut logging. If you want to protect the caves and the area, then limit those activities, but don't close off existing roads and trails to motorized use without good reasons.

The National Dualsport Riders Association is currently trying to establish an off road route through Southwest Oregon to the coast. An important piece of this invovles the Bigelow Lakes area and surrounding trail system. Establishment and use of this trail would certainly generate more exposure,

RESPONSES

Letter 51: Brian McKennon

Thank you for your comments.

visits and revenue for the Monument.

Regarding the four alternatives, my choice would be for Alternative B. I am not a big fan of concessionaires at NPS sites and I feel that my cherished motorized use has a greater chance for survival under the SNF protected area versus that area being incorporated into the Monument itself.

Thanks for the opportunity to comment and if there is further opportunity for input or any other way I can help as a private citizen please let me know.

Sincerely,

Brian M McKennon

L-

RECEIVED
MAR 03 1998
OREGON CAVES
NATIONAL MONUMENT

Feb. 27, 1998

To: The Superintendent of the
Oregon Caves National Monument
19,000 Caves Highway
Cave Junction, OR 97523

I would like to share with you my appreciation for the well-written Oregon Caves National Monument's Draft General Mangement Plan and Environmental Impact Statement dated December, 1997.

I support alternative C, the proposed alternative. Some of the parts of this plan that I find especially important include:

-**Allowing the National Park Service (NPS) to do the interpretive programs** (The NPS has an excellent history of good quality interpretation.)
-**Expansion of the monument boundary to include the watershed in which it is located** (I was dismayed to read that the monument boundary is presently so small. To protect the fragile ecosystem of the caves, it's extremely important to protect the headwaters above the caves and the surrounding environment. I was interested in reading that historically this has been a concern.)
-**Better protection of cultural resources by building a better storage facility**
-**Seasonal closure of the caves during winter to allow some protection for the ecology of the caves while allowing research**
-**Continuing lodging and food service for the public through the concessionaire**
-**Lodging of seasonal help at the monument since it is so far from Cave Junction**
-**Retaining services at the Illinois Valley Visitors Center in Cave Junction**
-**In the area off main roads, non-motorized recreation only**
-**No entry fee for access to the monument** (I do support a fee for entrance to the caves and agree that these fees should be maintained for use at the Oregon Caves National Monument)

I support inventory and monitoring of flora and fauna of the above and below ground ecosystems of the expanded monument.

1 I do have some concerns about re-introduction of fire to the area. Introducing fire now is different than the natural fires that occurred before Euro-American settlement, now we have non-native and noxious plant species that will invade areas of disturbance. It is extremely important to introduce fire at an appropriate time of year (when fires naturally burned – in the fall and summer) because vegetation of the area is adapted to that time (vegetation more dormant then). Fire management should be done appropriately with vegetative conditions (species natural to that area) and with a fire return interval that would be as comparable to prehistoric conditions as possible for the appropriate plant community. Monitoring of vegetation before and after prescribed burns is very important to watch for possible introduction and spread of non-native and noxious plant species.

I support Congressional action to make the 3,310 acre boundary modification of the Oregon Caves National Monument as written in alternative C.

Barbara Mumblo

Barbara Mumblo
Resident and Botanist of SW Oregon for over 20 years

cc: US Senator Ron Wyden
cc: US Senator Gordon Smith
cc: US Representative Bob Smith

129

Letter 52: Barbara Mumblo

1. Most of your concerns have been addressed in the revised GMP. We have an aggressive program to control exotic plants on the Monument. So far our prescribed burns do not seem to have increased or decreased the number of our most numerous species of exotics. We are introducing fire during the fall season. Based on most of the available evidence, late summers were the seasons of the highest frequency of ground fires. We are trying to mimic the natural fire cycle but may have to decrease the fire cycle interval to five to ten years so that we don't expend all of our fire funding on manual clearing so as to reduce fuel loads enough to be able to do prescribed burns. Because of the Monument's small size and the presence of historic structures and threatened species, we are unlikely to introduce the much longer cycle of stand replacement fires that occurred in this area pre-historically.

David Rains Wallace

March 1, 1997

Craig W. Ackerman
Superintendent, Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

RECEIVED
MAR 06 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Superintendent Ackerman:

In recent years, The Klamath-Siskiyou bioregion of northwest California and southwest Oregon has received growing international attention (including special recognition by the International Union for the Conservation of Nature and the World Wildlife Fund) as an area of outstandingly high biodiversity of coniferous forest and related ecosystems (meadows, bogs, caves, etc). As such, the bioregion has come to be at the "cutting edge" of research in a wide variety of scientific concerns such as anadromous fisheries, forest evolution, rare and endangered species, tectonic geology, and soil ecology.

130 Despite the increasing global importance of the region and the scientific and ecological values it embodies, however, the general public remains largely ignorant of it. (For example, an environmental reporter for the *San Francisco Chronicle* told me in 1997 that he had never heard of the Klamath Siskiyou bioregion, and an editor of the California Academy of Science's magazine was almost equally ill-informed about it.) This ignorance partly is a product of the complexity and subtlety of the bioregion and its values– superficially it may seem not different from other western North American forest regions and it has less obviously spectacular scenery than the Sierra Nevada, less visibly spectacular wildlife than Alaska. Yet I think an even more important reason for the ignorance has been the simple fact that very little information about the region and its values has been easily available to the general public.

National parks traditionally have been the way the United States has educated its citizens on the ecological values of their country, as in the Sierra Nevada with its three large parks and in Alaska with its gigantic ones. It is no wonder, then, that the public has remained ignorant of the Klamath Siskiyous, since Oregon Caves N.M., one of the tiniest units administered by the Park Service, long has been the *only* NPS unit in the bioregion. (The nearest national park units, Redwood and Crater Lake, respectively are located in the Coast Range and Cascades bioregions.) Despite hard work by a dedicated staff, Oregon Caves simply has not had the resources to make widely available the lessons– about rare plants, biological refugia, forest ecology, exotic terranes, etc.– that the Klamath-Siskiyous superlatively have to teach. This is not surprising in a unit whose infrastructure still resembles parks I visited as a child in the 1950s more than it does those of newer units such as Redwood NP.

Letter 53: David Rains Wallace

1. Please refer to Alternatives Considered but Rejected in the Alternatives chapter.

I therefore strongly support the Draft Oregon Caves National Monument General Management Plan and Environmental Impact Statement's Preferred Alternative (Alternative C) as a way to begin making the Klamath-Siskiyou's lessons better available to the public, as well as protecting and improving the Monument's resources and facilities.

I think the measures outlined in Alternative C– expanding the Monument by 3,130 acres, significantly upgrading the capacity and quality of the visitor center and other interpretive facilities, and having the professional Park Service staff operate the cave tours "with direct supervisory control over cave guides"– are essential. I believe the historical evidence presented on pages 1-3 of the draft GMP-EIS demonstrates that a much larger unit than presently exists has been the intention of government officials and planners virtually since the Monument's establishment. I also agree wholeheartedly with the alternative's expressed goal of placing "special emphasis... on development of interpretive displays and handouts that inform the public about the geological and botanical uniqueness of this region..."

As the draft GMP-EIS makes clear, the potential for enhancing the interpretive and recreational effectiveness of the Monument is enormous. Oregon Caves and its surrounding streams and forests– despite the damage caused by the past half century of intensive logging– can serve the visitor as a microcosm of the bioregion as a whole. Its patches of ancient forest and peridotite savanna are miniatures of the region's vast botanical wealth. Its cave also is a kind of miniature of the vast cave systems that recently has been discovered in the Marble Mountains Wilderness. Similarly, the recent paleontological discoveries in the cave give fascinating glimpses into the still very little known realm of the region's evolutionary past. Even the damaged areas can teach lessons in land management and rehabilitation, as at Redwood NP. I31

The enlarged and upgraded unit which the Preferred Alternative outlines would have enormous recreational and tourism value as a "jumping-off point" for visitors who arrive with only vague notions of the region's unique character but whose visits could be greatly enriched by it. If the proposals for trail connections with the nearby Siskiyou and Red Buttes wilderness areas could be realized, the monument also could be a literal jumping off point for recreationists seeking a deeper acquaintance with the region.

The only reservation I have about the Preferred Alternative is a fear that the 3,310 acres it proposes adding to the Monument may not be enough to protect an adequate sample of characteristic wildlife, vegetation, and other aspects of the bioregion to give the visitor a sufficient acquaintance with its values. Unfortunately, Forest Service policies provide no guarantee that the ecological degradation which already has occurred in the vicinity from logging, road building, grazing, fire suppression and other commercial activities will not continue or intensify. Given the "island effect," wildlife and vegetation within even a 3,794 acre unit could be impoverished by ongoing degradation of surrounding land. Such dangers are made starkly clear on page 2 of the draft GMP/EIS. "At the rate the face of the land is changing now, in thirty years (probably less) this area, if saved now, will be an outstandingly beautiful remnant of a unique mountain forest region that elsewhere will have largely vanished forever." 1

3

Expanding the monument to encompass roughly 50,000 acres of adjacent watershed (as proposed by the Siskiyou Project) would reduce the danger of such impoverishment and begin to reverse some of the impacts that already have occurred. Establishment and maintenance of old growth forest and riparian corridors between monument boundaries and the Siskiyou and Red Butte wilderness areas (coordinated with establishment of trail connections with those areas) would also help to protect against ongoing impoverishment and to reverse that which has occurred.

If such measures could be implemented, the dismal prospect predicted on page two of the draft GMP-EIS might be averted, and ecological conditions might actually improve. Perhaps Monument visitors could someday glimpse a marten or a fisher as well as the spotted owls that still live there.

Sincerely,

132

David Rains Wallace

cc Senator Dianne Feinstein, Senator Barbara Boxer

COMMENTS

Superintendent, Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

March 11, 1998

Dear Sir,

I am writing to comment on the Draft General Management Plan and EIS for the Oregon Caves National Monument. As a member of two off-highway motorcycle clubs (Siskiyou Trail Riders and Medford Motorcycle Riders Association), I was asked to voice concerns as regards motorized use in relation to the Preferred Alternative (Alternative C).

1 /133 In most national monuments motorized off-highway use is not allowed, so I specifically looked for OHV references in your plan. It was difficult to find any reference to motorized use, and what I found was somewhat confusing. Under the heading, National Resource Management, page 32, the plan says, "Though additional acreage would be transferred to the Monument, the same resource management guidelines would apply and the existing natural resource program would continue to be implemented." This reference seems to say the additional acreage would continue to be managed as is, which is under the LSR designation by the Siskiyou National Forest. This designation would allow motorized use on the trails already being used by motorized.

The references to recreation and trails in the Affected Environment Section, pages 109 to 111, identify the current use as motorized with the only reference to exclusion of OHV's on page 117, and that specifically for trails already in the Monument.

2 Although I did not have time to read the plan completely, it would seem reasonable to find some information on trails and OHV use in the sections I read through. Using these examples it would appear motorized use in Alternative C was not adequately addressed in the draft plan.

RESPONSES

Letter 54: Troy Dymock

1. Your assumption is incorrect. This sentence has been changed to read, "Though additional acreage would be transferred to the Monument, the same NPS guidelines would apply and the existing NPS natural resource program would continue to be implemented." The NPS policy does not allow motorized use on trails within the Monument.

2. New language has been added to the GMP to clarify motorized use on trails. Please see Alternatives chapter, Recreation Resources section.

3. Motorized access to the Boundary Trail is available throughout SNF.

3 Since the Preferred Alternative, in effect, expands the Monument to almost eight times its current size, it would seem reasonable to consider historic use when designating trails for recreational users. This area has been a designated motorized use area for many years with few user conflicts and minimum documented resource degradation issues. The major concern is about trails that connect outside the Monument boundary and, by their designation as non-motorized, would ban OHV's on a system historically used by them. Motorized use should receive the same consideration as any other legitimate recreational trail use.

Please review your draft plan and communicate with the Siskiyou National Forest and the OHV user groups before you categorically exclude all motorized use in the Preferred Alternative. You may contact me for additional information or clarification at (541) 476-3730 or write to Troy Dymock, 190 Triller Lane, Grants Pass, OR 97527.

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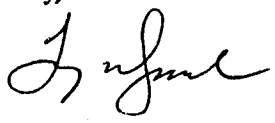
Sincerely,



COMMENTS

Ek David A.

March 10, 1998

RECEIVED
MAR 14 1998
OREGON CAVES
NATIONAL MONUMENT

Superintendent, Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Superintendent:

The following letter are comments on your Draft General Management Plan (GMP).

Pg. 7-9:

1 During the discussion on how the current boundary may be inadequate, the protection of water resources is primarily restricted to how outside activities may affect the public's water supply. Little mention is made of the possible effects upon the cave and its biology. Later note: this is corrected to a large degree within the Affected Environment Section, however, on the earlier pages, why are you being selective in the type resource impacts that are discussed?

Surely there are some staffing and research/monitoring needs? However, there is no mention of this under this section. Later in the document you propose several new positions on your staff, but do not address it as a need in this section.

Pg. 14:

2 Your suggestion that Port Orford cedar siding within the visitor center should be eventually replaced due to the scarcity of this tree, is a very good suggestion. The National Park Service should set an example for conservation. The traditional "look" of a NPS building, with its use of old-growth wood, oversized wood beams, etc. has its origin within the CCC. This is what was available at the time, and was appropriate for the times, based upon the current knowledge of conservation practices. This rustic "tradition" should be eliminated, except to replace existing components within historic buildings. Catering to this antiquated "tradition" is an affront to modern conservation practices. However, the NPS often succumbs to pressures to present a "traditional" look. An appropriate aesthetic should be able to be designed that is sensitive to modern conservation ethics. Your inclusion of this issue within the GMP is a fine example of a NPS site leading by example.

Pg. 21:

RESPONSES

Letter 55: David A. Ek

1. More information was added to the revised GMP on how expanding the boundary would better protect surface resources. There is much less evidence for impacts on the cave from past management activities adjacent to the Monument. Presumably, wind pollination of trees above the cave have been affected and some of the soil fauna recruited into the cave may have been affected by decreased soil moisture adjacent to harvested areas next to the Monument. However, until adequate studies can be funded and completed, it is largely conjecture at this point to speculate as to how edge effects impact the known cave system.

2. Please see amended language in Alternatives chapter, Actions Common to All Alternatives, item 11.

3. Yes, we agree

4. New language has been added to the final GMP/EIS to discuss uses within the expanded Monument.

5. Because of earth movements, the Monument headquarters building was removed. Administrative functions currently are located in the center of the main parking lot in a temporary trailer. Moving it to the proposed administrative site likely would reduce impacts on park resources and provide additional needed parking. This administrative site is the only relatively flat area within the proposed boundary expansion that is adjacent to an existing paved road. All other suitable sites are located too far away from the proposed boundary expansion.

COMMENTS

3 Generally I prefer options where new development and facilities are located outside park boundaries. However your proposal to have the visitor center facilities within the Chalet seems appropriate, since it is an existing building. However, some commitment should be made that forbids new developments if in the future this operation demands an expansion. If such an expansion would be eventually be needed, the operation should move outside park boundaries if existing buildings cannot accommodate the expansion. In other words, the placement of a new operation within park boundaries should not set a precedent that would lead to new developments within the park.

4 A more clear and better defined definition should be made of what activities are consistent with the 3,310 acre "protected area".

Pg 23:

5 Why move the administrative functions within the park? Why not keep these functions within the current headquarters building? For protection of park resources, it seems necessary to keep park operations within the park that are absolutely necessary for its operation. Many maintenance functions and most administrative functions are not critically needed within the boundaries of the park, especially when there is an option. Since the administrative function is current located outside the park, it appears that there is indeed an option. Why is this option being abandoned?

136

Pg. 22-24:

6 With the exception to recreation resource management and scenic resources management, natural resource management functions and research is barely mentioned. Is the protection and further understanding of the cave's rich biology/paleontology and hydrology resources that much less important than the protection of a viewshed?

Pg. 25:

7 If only one person is added to the staff, is a protection ranger the most important? Under the 'issues' section, I did not see a unmeet law enforcement need mentioned. However, I did read many resources management and science issues and concerns, issues that would be addressed by resources management staff and not a security/protection person. This section needs to be elaborated, for it is not well explained. The text only highlights the addition of one staff person (the protection ranger); however later charts and figures indicate that more staff positions are proposed. What is being proposed? What type of positions and how many? I'm not saying that the positions are not needed, however, your vagueness appear that you are trying to hide something and could lead to confusion and suspicion.

Pg. 28:

RESPONSES

6. The size of the section on natural resources is not equated to its importance. We can add after the first sentence "Inventories in the past have included grasses, bryophytes, vascular plants, cave formations, surface geology, amphibian and reptile inventories, cave and stream biota, snails and slugs; future studies will continue to fill in knowledge gaps, especially in biology. Monitoring in the past have looked at the effects of edges (snails, orchids, lichens, rodents), feeding of animals (rodents), cave trail impacts (biodiversity, lint deposition, formation darkening) and prescribed fire (rodents, vascular plants, cave drip rates, evapotranspiration) and will continue in the future by adding on more groups of animals."

7. The addition of a law enforcement ranger is deemed a higher priority than adding additional resource management staff because at present there is no full time law enforcement ranger. The proposal does, however, indicate that there will be additional personnel in the resource management function. In addition, much of the inventory, monitoring and mitigation involved with resource management can be better dealt with by the use of contracts and volunteers rather than an increase in paid staffing levels.

8. This is one of the considerations of development cooperative agreements with other federal agencies. If new evidence is acquired, for example, that suggests that current riparian buffers are inadequate, then the NPS cannot require changes without the consent of the other agency.

9. "How do viewsheds and safe drinking water protect the cave." Presumably if the viewsheds are protected, then they will retain their full complement of biodiversity, especially in the realm of soil fauna which are among the main colonizers and source populations of caves. Protecting drinking water probably does not directly protect the cave but helps satisfy other NPS mandates. This is true of viewsheds as well. NPS areas are managed under subsequent laws, not just the Organic Act. These laws address resources such as viewsheds.

COMMENTS

8 Exactly how would the arrangement with the SNF work in this hydrologically "protected zone". For example, many studies have indicated present riparian reserves buffers are possibly inadequate to protect important small and ephemeral water systems. If proved correct, will the NPS require the SNF to maintain bigger buffers than currently allowed by law? This is but one example of many issues that are not specified to the details necessary to understand what is being proposed. Statements that an agreement will be developed with the SNF to "protect" resources is not much details. Also, will the NPS have authority to make such stipulations? There is also bound to be much disagreement between the NPS and the SNF in determining what is an 'acceptable' management activity.

9 The primary values that are highlighted that would be protected are scenic viewsheds and potable water supplies. Cave protection is used as a arguement for setting up this cave protection zone, but how do viewsheds and safe drinking water protect the cave? Additionally, the "cave protection zone" on BLM land in New Mexico, designed to protect an unique cave in Carlsbad Caverns National Park, is being ignored due to political pressures. While you cannot plan for every contingency, the issues should be addressed to a greater degree than an agreement will be established that "protects" park resources. If it truly will protect park resources, then this alternative looks pretty attractive. However, I foresee many potential pit-falls in having a cooperative agreement of this type, especially agencies with clearly different mandates and political pressures. To truly represent this alternative, the potential ramifications and consequences should be addressed more fully.

Preferred Alternative Section:

10 While I inherently agree that the NPS should assume the interpretive duties currently handled by concessionaires, however, I do not see in the draft GMP, a compelling reason for the change. How will the park be better protected or the visitor's experience be better served under NPS interpretive operations, than with concessionaires?

Pg. 32:

11 Since the stated goals of the GMP is the protection of significant park resources and the mitigation of impacts and potential threats, how will the NPS accomplish these goals under the Preferred Alternative without the expansion of the park's resources management program? The NPS has learned a long time ago that protection of park resources requires more than merely drawing a line on a map around a feature. It requires constant, vigilant and active resources management. This seems a major deficiency of the Preferred Alternative. If it is an expansion of the park's resource management program is included within the Preferred Alternative, it appears buried, and it lacks needed details.

Pg. 38:

12 An inset map should be included for clarity, showing where this DCP is located to other features and areas within the park.

General:

RESPONSES

10. NPS staff operates under different mandates and motivation compared to concession operations. Most seasonal staff are career motivated and trained to incorporate resource messages in programs. Education of the public using issue related themes informs the public how to behave around resources. This approach protects resources from those who want to comply but simply don't know better. The NPS staff provides a wider variety of programs both inside and outside of the cave. Hence, a broader scope of links can be made between underground and above ground resources. The NPS develops partnerships that link Monument resources with regional resources and thus expands visitors' experience. Comparisons of all or nearly all measurable factors that have been shown to increase interpretive competence (as reflected in increased compliance and retention of information by visitors) are considerably higher among NPS seasonal interpreters compared to concession tour guides. Such factors that have been measured include age, experience level, educational level, interest level, training level, returnee rate and audit scores. Thus NPS assumption of interpretive duties currently handled by concessionaires is likely to increase the quality of interpretation and thus better protect park resources. Members of the public are more likely to comply with cave protection behavior when guided by a credible guide with an identifiable ranger uniform, as opposed to a less trained concession guide.

11. The preferred alternative would expand both the resource management and interpretation program and thus better protect significant park resources and better mitigate impacts and potential threats.

12. The relationship between the administrative site (Development Concept Plan) and other features in the park are shown in Figure 3, Physical Features. Language has been added to refer the reader to this map.

COMMENTS

13 The Chateau seems to be placed right in the drainage of Cave Creek. How is this affecting water quality and other resource attributes? There are many park buildings, parking lots, utility and sewer lines and other park infrastructure located below the cave. Are these operations located too low to have effect the karst? They are located below the cave, but are they also below the carbonate rocks? This should be stated or addressed. If there are any potential impacts to the karst from park operations, what is being proposed to mitigate these threats? What are the impacts from the cave tours and infrastructure needed for this development? The impacts resulting from cave development is touched upon in a couple of places, however I would think this GMP would need to expand the discussion of these potential issues, impacts and what management strategies are being proposed to mitigate these threats, and/or restore impacted resources. Is the Federal Cave Resources Protection Act relevant to mention in this section?.

14 It appears that due to recent discoveries and finds, that the cave's biological and paleontological resources are of greater importance than what was originally thought. With these new findings now brought to light, what is the park proposing that is different than before this information was brought to the park's attention? How is the park incorporating these findings into management recommendations, scientific research needs, staffing needs, and resource protection issues?

Pg. 41:

15 Staffing conditions are confusing in your document. It is implied under the preferred alternative that resources management functional areas will remain mostly the same- however this chart , when compared with earlier staffing charts (such as page 26, etc.), indicates that Preferred Alternative includes several staffing changes not immediately apparent. How many of these positions are new for this Alternative. It would be helpful to have this information in the chart so one does not have to constantly flip back and compare with earlier charts. What will these new persons be doing? For instance it appears that you intend to hire additional Resource Management staff. What will this person be doing? Will the position be a hydrologist, biologist, computer/GIS, technician or professional series, etc.? The same goes for the other park divisions. It is not clear how many new people you are proposing, what they will be doing, and what is the compelling rationale and argument for adding these people. This needs to be clarified, and explained.

Pg. 61:

16 Under Actions considered but Rejected Section, was the reduction or elimination of infrastructure from within the park considered? Some people would deem it inconsistent to argue to reduce timber harvest and road building due to impacts upon the visual scene, when an impact is occurring from the numerous roads, buildings, developments, utility lines and other park operations. The reduction of the infrastructure should be listed as

RESPONSES

13. Nearly all of the current buildings are located on non-marble. There is only one major karstic spring located below some of the buildings and its water quality is being monitored and is of high quality. Sewer and water lines were removed from the only building above the main cave (the Ranger Residence). If these lines are ever reintroduced then a double pipe system with periodic video monitoring would be installed.

14. The importance of the biologic and paleontologic resources lies in their national significance and would still require protection regardless of such significance. Further inventories may reveal an increased need for increased monitoring or protection of certain species, especially those deemed as keystone species or non-redundant in their ecologic functions or those ecologic functions deemed as critical such as those important in vegetative structure, stream channel heterogeneity, energy transfer, or nutrient recycling.

15. One new person would be added to cover management of the additional acreage. Their most important functions would be fire management, GIS, and inventory and monitoring.

16. The following has been added to the final GMP to address visual impacts from present development within the Monument: "Reduction or elimination of infrastructure from within the Monument to reduce visual impacts—Most of the present infrastructure is necessary for the accommodation of visitor needs, health, and safety and the protection of park resources. A ranger office, small toolshed and a small garage are the only major structures in the Monument that are not in the National Register historic district and are not eligible for listing. The ranger office (temporary trailer) is a modular unit which would be removed in Alternatives B, C, and D when the administrative functions are moved into other areas. Although the toolshed and the small garage have been sheathed with Port Orford cedar bark to blend in with the buildings of the National Register historic district, they will be considered for removal if the Monument gains full control over storage facilities in the Chateau. Plans have also been made to remove overhead utility lines between the Chalet and Chateau."

16 considered but rejected, for I assume it was considered. If it wasn't considered, then why not?

Page 71:

17 Lechuguilla Cave is misspelled.

Page 106:

According to the maps and narrative, the majority of the cave's watershed is either within old-growth forests within the park, or else in Late Successional Reserves in the SNF. While limited amount of thinning and certain harvesting is allowed within LSRs, overall, it appears that there is not a "significant" threat to the cave to warrant acquiring additional lands. The narrative mainly speaks of threats to the park's water supply, not resource threats.

18 There is a large section within the GMP that discusses viewsheds. While many visitors and parks are concerned about viewsheds, a stronger case may need to be given for Oregon Caves. The enabling legislation highlights the protection of the cave. Viewsheds do not affect the cave. Some parks, such as Rocky Mountain National Park, include viewsheds within the enabling legislation. Viewsheds are also intrinsically important for parks such as battlefields, whereas the historic integrity of the scene is altered. However, playing "Devil's advocate", one could argue that viewshed protection is relatively low-priority for Oregon Caves since it is not in the enabling legislation, does not impact the cave resource, and likely only to improve due to the LSR designation and the expiration o the Salvage Rider. I feel viewshed protection is important, however the argument for elevating its importance should be highlighted.

Overall:

I Support the Preferred Alternative. I thought the Draft GMP was well written; however, some clarification would be useful, not only for clarity, but also to make your proposal and arguments more compelling.

Thanks for the opportunity to comment.

David A. Ek

17. The Misspelling of Lechuguilla was corrected.

18. Water from Lake Creek is a Monument resource, especially after it is used by visitors, piped into the septic system and ultimately becomes part of the groundwater flow entering lower Cave Creek. The other threats, even in LSR's, include edge effects, high road densities, human-caused fires, viewsheds, and alien plants invasions. Except for the additional of small acreage of likely hydrologic input into the caves in surrounding National Forest lands and the possible effect of LSR's management on soil fauna that may enter the caves, there may well be no "significant" impact on the known caves that the larger expansion addresses. However, the NPS is mandated to protect all park resources, not just those resources for which a park area was specifically established to protect. As old-growth continues to be logged and small old-growth patches are degraded from edge effects and forest fragmentation, the old-growth resources at Oregon Caves National Monument will increase in importance in terms of national significance and as a source area of biodiversity. Viewsheds are not addressed in the enabling legislation but they are an indicator of ecosystem health that could affect the cave through soil fauna migration and pollination of above-cave conifers. The viewsheds would be better protected from human impacts under NPS administration than under LSR management by the USFS.

COMMENTS

Deer Creek Grange #371
PO Box 19
Lakeshore Drive
Selma, Oregon 97538

Master
Bill Weggoner

Secretary
Marylin Kincheloe
597-2444
Treasurer
Merlin Herrmen
597-4301

RECEIVED
MAR 15 1998
OREGON CAVES
NATIONAL MONUMENT

March 13, 1998

National Park Service
Attn: Crag Ackerman, Superintendent
19000 Caves Highway
Cave Junction, Oregon 97523

Dear Sir:

Subject: Draft General Management Plan Oregon Caves National Monument

Whereas: The National Park Service (NPS) is proposing in its preferred alternative "C" in the Draft General Management Plan to take over the cave tour interpretation and reduce the number of visitors taking cave tours. 140

Whereas: The current management of the Oregon Cave tourist business is being managed by the Oregon Caves Company whose past performance records show a great big plus for Josephine County taxpayers, the state of Oregon, and the U.S. Government.

Whereas: The Oregon Caves Company, PO Box 128, Cave Junction, Oregon 97523 over the past few years has paid money to the following governments:

1. $43,966 in property taxes paid to Josephine County from years 1993 - 1997,
2. $320,000 equivalent franchise fees paid to the U.S. Government from the years 1994 - 1997, and
3. $80,000 paid in the State and Federal taxes from the years 1993 - 1997.

Whereas: The Oregon Caves Company promotes the area, the caves and supports the community, spending over $50,000 annually on marketing and donations to community events and youth sports. Further, the Oregon Caves Company employ local people as interpreters.

Whereas: The Oregon Caves Company which is a private enterprise, would lose an average annual revenue of $360,378.

Whereas: The Oregon Caves Company does not use taxpayer dollars to support the business. The National Park Service will not financially

RESPONSES

Letter 56: Deer Creek Grange #371

Thank you for your comments. Also, please see NPS responses to Letter 15.

profit from the operation with reduced number of cave tour visitors. Taxpayers will also have to pay the $2,000,000 for the NPS housing building costs for their interpreter hires.

Therefore be it resolved: The Deer Creek Grange #371 membership opposes the U.S. National Park Service (NPS) Management take over of the Oregon Cave Tourist Business. We support private enterprise as a relief to the taxpayer's burden.

This resolution adopted by the Deer Creek Grange #371 at its regular meeting held March 10, 1998.

William D. Waggoner

William D Waggoner
Deer Creek Grange #371 Master
PO Box 19
Selma, OR 97538

cc: Oregon Caves Company
Attn: General Manager, Mike Romick
PO Box 128
Cave Junction, OR 97523

cc: Josephine County Pomona Grange

I41

COMMENTS

L-116

Rod G. Craig

March 4, 1998

Mr. Craig Ackerman, Superintendent
Oregon Caves National Monument
19000 Caves Highway
Caves Junction, Or. 97523

RECEIVED
MAR 09 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Superintendent Ackerman,

I wish to comment on the Oregon Caves Monument Draft General Management Plan. I have several concerns regarding alternatives B, C, and D.

1. I understand watershed protection is and rightly should be a priority in our country today. The watersheds and viewsheds located within the proposed boundary change are currently protected by virtue of being listed as Late Successional Reserve in the Northwest Forest Plan. Therefore they need no further protection.

1 2. Would proposed boundary require fencing to discourage grazing encroachment by range allotment livestock?

142

2 3. Does historical data exist which supports the implication of Monument water degradation? If so, what are the symptoms of water degradation occurring in upper Lake Creek and Cave Creek watersheds affecting the Monument as implied in the draft GMP?

3 4. What consideration, if any, was afforded the current users of the proposed acreage to be added to the Monument? Personally, my family has been using this area for recreation for four generations.

4 5. Is construction of new collection storage, administrative offices, and housing needed because of disrepair and poor maintenance or because of overcrowding of existing facilities?

6. Alternative C would add 10 full time equivalent staff and at the same time reduce the maximum number of cave visitors allowed from 1760 persons per day to 700 persons per day. This is a 60 % reduction in cave tours with a 71 1/2 % increase in staff. A 4.2 million dollar investment doesn't seem prudent to purchase lower revenue and higher operating costs.

5 7. Is a "visitor protection presence on the Monument staff" the equivalent of a law enforcement officer? Are crime statistics available supporting hiring a law enforcement officer for the Monument?

Congress established Oregon Caves National Monument to protect the caves. The Monument serves this purpose well. It was not intended to be a large national park. Tourists traveling Highway 199 can drive the 20 miles on Highway 46 to the Monument, tour the caves, return to Highway 199, and continue on their way.

RESPONSES

Letter 57: Rod G. Craig

1. The boundary adjustment in the proposal would require a cooperative effort among the NPS, USFS, and grazing allotment permittee in preventing cattle encroachment onto the Monument. The NPS and USFS staffs from the Siskiyou and Rogue River National Forests and Oregon Caves National Monument have looked at possible alternatives to provide cost effective measures to prevent cattle encroachment under a range of alternatives proposed in the Big Grayback Grazing Allotment plan. At the time of publication of this document, the Rogue River National Forest was developing a proposal in which the NPS would be responsible for installing a short section of drift fencing along the ridge top above Bigelow Lakes to prevent cattle from accessing this area. The plan would maximize use of natural barriers and minimize the need for fencing and associated maintenance. Maintenance of the fence would be cooperative effort of the NPS and the permittee. A cattle guard would be used at the intersection of USFS Roads 4611 and 070 to prevent access at that point.

2. Continuous monitoring and recording of water treatment data for the Lake Creek system is required by the State of Oregon. Documented records indicate an ongoing problem of high turbidity in the water supply. It is the opinion of NPS hydrologists and karst hydrogeologists that continued use or construction of roads and potential mining activities represent a threat to continuing or increased impacts to these water systems. The Lake Creek water system was shut down for two weeks during peak visitation season in the early 1980s due to unacceptably high levels of turbidity. The cause of the turbidity was most likely attributable to failure of a culvert and erosion from roads in the drainage.

3. Existing recreational uses were considered in the planning process. Accommodation was made for recreational uses (such as horseback riding and back country camping,) that could be managed so as not to present unacceptable levels of impacts to Monument resources or other recreational users. Uses which are in direct conflict with laws and regulations (such as hunting,) or those that presented a continued threat to impact resources (such as mining and driving of motorized vehicles on trails within the watershed) were not appropriate to include in the plan.

4. Construction of the new facilities is needed both due to the condition and inadequacy of existing facilities. For example, the old Monument headquarters building was already damaged beyond repair by an earth slide and has been torn down. The existing quonset hut storage facility has been determined to be a health and safety hazard for employees by both internal NPS Risk Management inspectors and the U.S. Public Health Service.

5. The term "visitor protection" encompasses the duties of law enforcement, emergency medical services, and search and rescue. The Monument operates under proprietary jurisdiction which requires that an NPS commissioned officer handle violations of the Code of Federal Regulation while the county has primary responsibility for enforcement of state law. Protection staff is required even in absence of "law enforcement" incidents.

The National Park Service invites you to share your thoughts regarding the future of Oregon Caves National Monument. Four alternatives, including the preferred alternative, are presented on the first two pages of this newspaper for your review and comment. The alternative which is ultimately selected may involve aspects from several alternatives, shaped with the help of public comments.

Information provided to us will help to determine our final course of action. We expect to produce a final *Oregon Caves National Monument General Management Plan and Environmental Impact Statement* and Record of Decision sometime later in the summer of 1998..

We hope you will take the opportunity to read and also comment on the draft plan and alternatives by either reviewing this summary or by reading a full text of the plan. Copies of the document are available in area libraries, or by requesting a copy from the Monument headquarters office listed below.

To mail, please fold this form in half, enclose additional sheets of comments if necessary, seal it with tape (do not staple), and mail to the preprinted address.

Send Comments By
March 13, 1998

Please contact Craig Ackerman, Superintendent, if you have additional questions on Oregon Caves National Monument, 19000 Caves Highway, Cave Junction, Oregon 97523, (541) 59 100.

Do you want to remain on our mailing list?
for future planning Newsletters? (Yes q) No q
for future Monument activities? (Yes q) No q

MAR 13 1998

Please print your name and address below if you wish to be added to the mailing list:

Name: N-69
William Broeckel

Address:

City, State, Zip:

COMMENTS:

I support alternative "C". The entire karst drainage system needs to be included in order to conserve the cave. Access to the road along the Southern boundary should be controlled + fire protection. And the Cave Jct. Visitors Center should not provide information about Caves in other areas. Please send me a draft and a final plan. Thanks — B. Broeckel

(Please include a separate sheet if you have additional comments.)

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144

Letter 58: William Broeckel

Thank you for your comments.

The Nat[illegible] you to share your thoughts regarding the future of Oregon Caves National Monument. Four alternatives, including the preferred alternative, are presented on the first two pages of this newspaper for your review and comment. The alternative which is ultimately selected may involve aspects from several alternatives, shaped with the help of public comments.

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To mail, please fold this form in half, enclose additional sheets of comments if necessary, seal it with tape (do not staple), and mail to the preprinted address.

Send Comments By
March 13, 1998

Please contact Craig Ackerman, Superintendent, if you have additional questions on Oregon Caves National Monument, 19000 Caves Highway, Cave Junction, Oregon 97523, (541) 592-2100.

[illegible] you want to remain on our mailing list?
for future planning Newsletters? Yes q No q
for future Monument activities? Yes q No q

FEB 26 1998 N-45

Please print your name and address below if you wish to be added to the mailing list:

Name: 2-23-98

FRED MITTLEMAN

Address:

City, State, Zip:

COMMENTS:

THE PUBLIC MEETING ROOM AT THE I.V VISITOR INFO. CENTER OUGHT TO BE REOPENED.

THE I.V. CHAMBER OF COMMERICE OUGHT TO FIND A PRIVITE PROPERTY LOCATION FOR THEIR OFFICE. THEIR OFFICE AT THE V.C. IS NOT IS NOT A PROPER USE OF PUBLIC NATIONAL PARK SERVICE PROPERTY.

(Please include a separate sheet if you have additional comments.)

FOLD HERE

1

145

Letter 59: Fred Middleman

1. The plan recommends renovation of the Illinois Valley Visitor Information Center (IVVC) to accommodate a reservations station and to make the facility more compatible with interpretive displays and exhibits. The additional space made available by remodeling could be used for a variety of purposes, including public meetings. However, under current interagency agreements, such operational decisions would be made by the IVVC board with concurrence by the NPS.

National Park Service
Columbia Cascades Support Office
909 First Ave, Suite 500
Seattle, WA 98104-9882

FEB 26 1998

N-19

February, 16,1998

Dear Park Service,

I am writing today to let you know of my views on the Draft Management Plan for the Oregon Caves National Monument that you are considering. Alternative A is the only acceptable alternative that I can support at this time.

My reasons are as follows

1. The proposed expansion boundaries include areas that are important to my hunting heritage, and to the future hunting heritage of my offspring. I have been a user of these land for 30 years and I am quite disturbed at the notion of losing the right to carry fire arms in any location of the forest. I see it as a blatant infringement of my Second Amendment rights. It is also disturbing to me after talking with the Oregon Caves Staff at the Open House in Grants Pass, that they would casually dismiss my concerns as " Its only a few acres". These few acres are very important to my hunting heritage, which I hope to pass on to my children. Remember that the Oregon Caves were discovered by a hunter, so hunting is also part of the Oregon Caves history and heritage
2. The proposal to eliminate grazing has all the earmarking of a preservationist agenda as cattle have been grazing in the area for a long time, and there have been no ill effects to me as I have camped, swam and drank from Bigelow Lakes on numerous occasions throughout the years. It is quite possible that the rare plants may be there today because of the cattle keeping the soil in the condition for the plants. If the cattle were so bad for the plants, they would have wiped them out long ago. As for the cattle bringing in diseases to the Oregon Caves water supply, if you eliminate the cows, you had better exterminate the deer and the mountain beaver also because they carry the same diseases. I believe that with today's technology a suitable water purification system could be implemented to solve the water quality problem.
3. Your proposal to staff a Law Enforcement Officer to police the forest under the guise of "visitor protection presence" is both unnecessary and intimidation to me. There must be a hidden agenda for the vague wording of the draft in this matter. It causes me much alarm as I have used the lands extensively and see no need for a law enforcement officer in this area.
4. The reasons sited for the new boundary area that have to do with logging in the area are absurd as there will be no more logging in the effected area. The environmentalists have already seen to that, and this will have a major impact on me personally as I work in the local Timber Industry. Any more land taken out of the sustainable harvest timber base only means that the local economies will suffer.

In conclusion I will say that the proposals that cause me much concern are all in Alternates B,C,and D. The parts of Alternates B,C, and D that would be acceptable are more than overshadowed by the hidden agendas and the preservationist attitudes of the writers of the Draft Management Plans.

Thank you,

Michael P Conner

146

Letter 60: Michael P. Conner

Thank you for your comments.

Author:
Date: 3/13/98 12:45 PM
Priority: Normal
TO: Roger Brandt at NP-ORCA
Subject: Ore Caves Mgt Plan

I've read through the alternative listed in the proposed Oregon Caves Management Plan and support alternative C in general.
I like the idea of having the Park Service running the show instead of a consessionaire. This seems to promote the idea of educating the public, rather than just raking in the dollars. I also don't think that the incentive of making money is necessarily in the best interest of the cave.
I also like the idea of encorporating more of the karst area into the park's boundarys. Preventing contamination of our underground water sources is something many people are just starting to appreciate.
My only criticism of the plan would be in the amount of building/renovation called for. I'd like to see basic needs for personnel/artifacts taken care of first, and enhacements like visitor displays/auditoriums come later. Movies are nice but not necessary.
I also question the logistics of maintaining the IVVC. It seems like you'd be spreading resources thinner than necessary.
All in all a good plan, if perhaps a bit ambitious. As always, it's easy to nit-pick someone else's work, but I hope I've been constructive in my critique.

1

147

Brett Cook

Remove space after @ sign to reply.

RECE
MAR 1
OREGON
NATIONAL

Letter 61: Brett Cook

1. Development of facilities listed in the plan will be phased over a period of several years. The first priority for facility development will be replacement of the administrative headquarters building and quonset hut with a multi-purpose facility that will provide working space for staff and an area for preparation and storage of historic artifacts and items. Adaptive renovation of the chalet for use as a visitor orientation center and employee quarters would be undertaken in subsequent years.

   We believe that the presentation of an audio-visual program in the visitors center is an important element in the overall interpretive experience of the Monument. Such a presentation will allow visitors to gain some insight and understanding of the cave ecosystem before actually entering the cave for a tour. Further, the program would allow those disabled visitors who are unable to complete a cave tour an opportunity to gain a basic understanding of the Monument's resources.

   The Illinois Valley Visitor Information Center is operated as a partnership between the NPS, Bureau of Land Management, USFS and three local agencies. It serves a function of providing a contact station at which visitors may receive basic information not only on the Monument, but of resources and recreational opportunities in the region. Continued involvement of the NPS in the center is essential to the success of the plan. The Cave Junction site will be the primary reservation site for cave tours. This will allow visitors to better schedule their time and reduce crowding at the Monument.

Author: "Cook; Brett"
Date: 3/16/98 8:41 AM
Priority: Normal
TO: Roger Brandt at NP-ORCA
Subject: RE: Ore Caves Mgt Plan

Brett

>-----Original Message-----
>From: Roger_Brandt@nps.gov [SMTP:Roger_Brandt@nps.gov]
>Sent: Saturday, March 14, 1998 9:11 AM
>To: RopeWalker
>Subject: Re: Ore Caves Mgt Plan
>
> Brett
>
> Could you give me your address so I can add it to our official mailing
> list for the draft plan. We will use this list for mailing out
> updates and progress reports regarding the plan.
>
> Roger Brandt
> Chief of Interpretation
> Oregon Caves National Monument
>
>
>_____ Reply Separator
>_____
>Subject: Ore Caves Mgt Plan
>Author:
>Date: 3/13/98 12:45 PM
>
>
>I've read through the alternative listed in the proposed Oregon Caves
>Management Plan and support alternative C in general.
>I like the idea of having the Park Service running the show instead of a
>consessionaire. This seems to promote the idea of educating the public,
>rather than just raking in the dollars. I also don't think that the
>incentive of making money is necessarily in the best interest of the
>cave.
>I also like the idea of encorporating more of the karst area into the
>park's boundarys. Preventing contamination of our underground water
>sources is something many people are just starting to appreciate.
>My only criticism of the plan would be in the amount of
>building/renovation called for. I'd like to see basic needs for
>personnel/artifacts taken care of first, and enhacements like visitor
>displays/auditoriums come later. Movies are nice but not necessary.
>I also question the logistics of maintaining the IVVC. It seems like
>you'd be spreading resources thinner than necessary.
>All in all a good plan, if perhaps a bit ambitious. As always, it's easy
>to nit-pick someone else's work, but I hope I've been constructive in my
>critique.
>
>Brett Cook

>
>Remove space after @ sign to reply. << File: RFC822 message headers.txt >>

COMMENTS

Comments on the
Oregon Caves National Monument
Draft General Management Plan
and Environmental Impact Statement

2/6/98

RECEIVED
FEB 12 1998
OREGON CAVES
NATIONAL MONUMENT

62

Gentlemen,

1 In the "Affected Environment" sect. (pg 90) 1st paragraph, you should not allow the IVVC (Illinois Valley Visitor Center) to tell the public about "...the USFS Marble Mountains Wilderness Area of... which has a cave system that sits in a geologic setting similar to Oregon Caves..."!

They can simply imply that there are cave system(s) in Northern Calif. that have similar karstic circumstances or conditions (ie forested alpine karst in a wilderness-like setting...).

That would be more acceptable than to direct people to the Marble Mtn Wilderness, looking for a beautiful cave similar to Oregon Caves NM. Why direct anyone to a pristine and fragile area?! It is a very heavy and important responsibilty that you are giving them - to do a good part of the natural history interpretation of the Monument.

I also found a few typos and text missing on pp 61 and 62. (see below:)

149 (item #1 , paragraph 2) "...by a nonprofit organization as a...center in summer seasons and a hotel in peak seasons...."

2 (item #6 , paragraph 7) The statement about not having any "...studies to identify whether or not there is any subsurface hydrological connection between Cave Creek and Limestone Creek watersheds, which in turn may impact the hydrological resources of the cave." Now, that isn't addressed further in the document, that I could find. And, that can certainly impact any land acquisition in the future, when managing for the hydrology of the park's caves and water quality.

On the plus-side to the draft, it is well done. The additional acres will be better for water quality; the more interpretation, inventory and restoration is the best for the cave and the public. The USDI guided tours is a long time a-coming, and the quality, size, frequency and season of the tours are much better - and good for the cave and its bats! The carrying capacity of the cave was addressed, which is very good. The admin. shuffle of the use of the buildings is the best. Fire management plan is good idea too... Gotta save the Monument from a catastrophic fire! Getting rid of the consessionar, finally done - good idea!

All in all, very good! Keep me on your list for mailing and volunteerism. Keep up the good work! Thanks!

Jim

RESPONSES

Letter 62: Jim Wolff

1. Information about caves in the Marble Mountains wilderness area was removed.

2. Dye tracing was done in Limestone Creek and no connection was found with Cave Creek. Coupled with the geologic mapping done in the past ten years in and near the Monument, it appears unlikely at this time that there is a substantial hydrologic connections between the two systems.

L-53

Lane Cosner

RECEIVED
MAR 04 1998
OREGON CAVES
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March 03, 1998

Superintendent, Oregon Caves National Monument

Dear , Craig Ackerman

1 I want to submit my formal declaration in support of the "Preferred Alternative C" in regards the expansion of the Oregon Caves National Monument! I would also like to see the expansion of the South boundary to include the logging road, all of the Limestone Creek drainage and indeed the Sucker Creek drainage if at all possible. This is a very important addition to the alternative "C", in that this logging road could, and probably will be used by the Forest Service to log this pristine area, and will allow motorized access into this area if this is not protected. A serpentine deposit is within this area hosting many rare endemic plant species. Easy access would certainly jeopardize the health and future of these plants as they would most likely be trampled and/or adversely impacted. This road could also could help introduce pathogens right up to and into the Park itself. Accidental and/or intentional fire could also be introduced dangerously close to the Caves. If this boundary was expanded it would give the Park Service Management a necessary control of this southern corridor and its ridge leading to Lake Mountain and Mt. Elijah. This area contains many wonderful trails. To the north and west an expansion of the entire Greyback area would also be most desirable. This entire eco-system is in a much needed state for deserving immediate protection. Other suggestions that I have would be to definitely take control of the Caves and the tours as I think that a much higher standard would be displayed by the Park Service with a greater educational experience for all visitors. I believe that shutting down the Caves for extended periods every year would be in the best interests of the Caves health. The Caverns must be allowed to recuperate if we are to have these Caves in the closest natural state possible for future visitors and researchers. I do not at all think that tourism will suffer with these restrictions, as quality of the experience will rise considerably. I do not think that the Concession contributes much at all to this most unusual natural land form and in fact may detract from the potential that these Caverns offer. Our community at the base of the hill from the Caves will do just fine with less Concession influence. I also believe that the recent theft of a priceless rock formation from within the Caves would have been prevented from ever happening if the Park Service had control of the Caves and their tours! The Park Service have also spent many hours with volunteers including myself repairing the Caves to their natural state; but not the Concession. Another suggestion that I have is to have a shuttle service , from the Oregon Caves Visitor Center to the Park itself. This could be phased in during peak tourist flow and cut down considerably on the traffic to and from the Caves. This would also save monies in the long run as highway usage might be lessened. I think that maybe keeping the existing property at the Visitors Center and allowing folks to park their rigs there would be ideal. A security guard could be employed at this site to reassure visitors. The gift shop could also be redesigned so as to allow only locally made foods and crafts to be sold. These Caverns have of late been host to some of the most astonishing discoveries in the western hemisphere involving caves and palentological finds. This is something that many people here are proud of and want protected. This is surrounded by some of the most pristine forests left in the North American continent and is disappearing rapidly. I believe that the time is right and that this is indeed a National treasure that should be preserved at all costs for future generations ! And many thanks for a wise choice in Preferred Option C. You have my support!

Sincerely,

Lane W. Cosner

Lane W. Cosner

150

Letter 63: Lane Cosner

1. The broad adverse effects of forest fragmentation on large areas are fairly well documented (Harris, 1984; Johnson, 1991; Lehmkuhl and Ruggiero, 1991; Mills, 1993; Rosenberg and Raphael, 1986; Saunders et al., 1991). However, scale effects of forest fragmentation on an area the size of the Monument is less well documented compared to the reduction of edge effects and the protection of water quality and viewsheds that the listed alternatives address. Therefore, coupled with the uncertainty of the levels of funding, management, and mitigation of impacts provided by the relevant federal agencies, it is undetermined at this time whether the expansion of the Monument beyond the Limestone Creek and Sucker Creek drainage would significantly reduce human impacts on Monument resources. Under planned LSR management, it is unlikely that the section of the Limestone Trail would be converted to a logging road that might increase impact on our fragile serpentine area or introduce Port Orford cedar root rot or human-caused fires to the Monument. However, we will continue to monitor and evaluate these potential impacts.

March 12, 1998

RECEIVED
MAR 17 1998
OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman, Superientendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, OR 97523

Dear Craig:

I enjoyed reviewing the draft GMP/EIS and have the following comments. First, I would like to commend you and the planning team for proposing Alternative C since the three main actions in it are the ones most needed to bring about a better educational experience for visitors. These components are interconnected and consist of the following changes to the present situation at Oregon Caves: 1) having the NPS conduct the cave tours; 2) buying all of the concessioner's possessorary interest; and 3) enlarging the monument by 3,310 acres.

It has long been my contention that the National Park System exists primarily to educate and inspire people. Research and resource management are vital activities which support the main goal, something that is best facilitated by the National Park Service interpreting the key features of a park unit--hopefully in such a way that visitors obtain new insights about the world around them. I thereby urge you to emphasize education as the primary justification or linchpin for proposing Alternative C.

I can speak from personal experience why I think the NPS must take over the cave tours. Having been a guide in 1977, the tour was simply a sequence of stops where there was little or nothing in the way of a theme. Instead, information about the cave was simply memorized so that guides could do a "show and tell" that sometimes entertained, but rarely provided anything of long-term value to visitors. The tour was analogous to a teacher being one or two lessons ahead of the class--and this was only because a cave is an unusual and sometimes disorienting environment for the first time visitor. I have since paid to go on tours several times, but seen little change in the overall quality of interpretation. This is despite the tremendous advances made by the cave restoration project and the amount of scientific information generated since John Roth arrived in 1988. What the concession guides lack is incentive (my pay was minimum wage minus room and board, with little or no compensation for being on call six days a week unless I was in the cave--this doesn't seem to have changed much) and the oversight provided by an organization with an infrastructure (staff, library, and museum collection) to do interpretation. It is finally time to join the rest of the National Park System and have NPS employees do interpretation.

Buying the concessioner's possessorary interest would allow the NPS to have the type of presence it has never enjoyed at the monument. A visitor center at the Chalet would reinforce an educational emphasis more than the existing gift shop. As an aside, the latter is considerably larger than it was 20 years ago, and I have noticed that the generally low standard of merchandise is slowly spilling over to the Chateau lobby. Full control of both buildings will give the NPS more power to maintain their historic appearance despite minor changes with respect to functions. Much of the gift merchandise, if there is a market for it, could be sold in Cave Junction. I also think that acquiring possessorary interest should extend to historic

Letter 64: Steve Mark

1. Since the NPS already can conduct interpretive programs at Cave Creek and its distance from the Monument precludes a strong justification for including the area on ecologic grounds, Cave Creek Campground was not included in boundary expansion list of alternatives.

2. Lessening the threat of fire stemming from outside the Monument is dealt with in cooperative fire agreements with the USFS.

3. Please see amended language in Alternatives chapter, Actions Common to All Alternatives, item 11.

4. The GMP would be amended to include a traffic signal only if other options are not successful. This would include posted signing and other measures.

5. There is insufficient information to do an economic assessment of the Lake Creek watershed's commodity values.

6. The NPS has a GIS generated map showing pre-1994 timber sales. Practically the entire vicinity has been cut and harvested at some time in this century. The planning team wanted to concentrate on what is happening around the Monument currently and how USFS practices have impacted the Monument's resources.

7. As stated in the draft GMP, there are no American Indian communities in Josephine County, but members of the Takelma native populations who lived in the Oregon Caves area in the past may now reside on one or two contemporary federally recognized American Indian tribes in northwestern Oregon. Copies of the draft GMP were mailed to both the Confederated Tribes of Grand Ronde community of Oregon and the Siletz Tribal Council. Several letters were sent but there have been no replies as of this writing.

furnishings, especially in the Chateau, where Monterrey furniture and the Kiser photos hung in the lobby are character-defining features.

I see the proposed transfer of land from the Siskiyou National Forest as needed physical plant for a national monument where the educational emphasis drives NPS operations. A secure water supply is absolutely essential, so it is imperative that the NPS control the upper Lake Creek watershed. An expanded monument and greater NPS interpretive staffing provides an exciting opportunity to better connect the terrestrial environment with subterranean features in the minds of visitors. The expansion will supply a permanent venue for NPS administration and collection storage, but wish you would consider adding Cave Creek Campground to the proposal. As I understand conditions presently, the Forest Service lacks funds to operate this site. It could be a splendid venue for evening interpretive programs, and allow for guided hikes along the Cave Creek Trail. 1

As for specific comments on the text of this draft document, I have a few observations:

1) I see little mention of how to lessen the threat of fire stemming from outside the monument. This seems more important than fuel reduction on the monument (the imminent danger posed by the Caves Fire of 1989 comes to mind); 2

2) Port Orford-cedar siding is a character-defining feature of the Oregon Caves Historic District and I think discussion of an alternative is premature; 3

3) I fail to see the need for placing two traffic lights in the historic district, especially where they could have a negative effect on the designed landscape. In periodically observing traffic patterns on the roadway from the parking lot to the plaza over the course of the last 20 years, there does not seem to be much need for them; 4

4) There should be some economic assessment of the Lake Creek watershed's commodity values (timber volume, range, mushroom picking, etc.); 5

5) It is puzzling to see so much background about the Northwest Forest Plan and yet no map showing pre-1994 timber sales in the vicinity. The maps, with just a few exceptions, lack sufficient reference points to convey the intended information to readers. There are places where section lines, contours, drainages, and locations (roads, campgrounds, etc.) need to be indicated; 6

6) There should be additional effort made to consult with tribal members, given the possibility of people with knowledge of the monument residing in northern California (Happy Camp, Hoopa, Crescent City) or southern Oregon (Canyonville). 7

7) Perhaps some interpretation of the concession chronology on pp. 123-129 is in order so that the changes proposed in the preferred alternative have even more justification.

Thanks for the opportunity to comment. I hope the above is helpful.

Sincerely,

Steve Mark

March 12, 1998

OREGON CAVES
NATIONAL MONUMENT

Craig Ackerman
Superintendent
Oregon Caves National Monument
Cave Junction, OR 97523

Dear Craig,

As an Illinois Valley resident, former Oregon Caves concession employee, and former local business owner, I have read the new Park Management Plan alternatives and support alternative C as the best alternative.

The expansion of the park would help to protect the resource and also with proper development could provide recreational opportunities which could encourage longer stays at the Oregon Caves and in the Illinois Valley.

I especially support the NPS taking over the tour operations from the concessionaire. This would provide seasonal job opportunities for valley residents or college students which would be closer to family wage jobs instead of minimum wage. The increased wage should encourage people to apply who are more mature, intelligent and capable of conducting quality tours. Although the current concession management staff does not believe this type of person lives in the valley, I beg to differ with them. It is also traditionally the role of the NPS to interpret the main resource and from the inside of the cave they would be in a better position of protecting the resource.

I support the reservation system and hope it will spread visitation out over the day, thereby eliminating the mid-day crunch and backlog of visitors between 11:00 am and 2:00 pm. Also, if a visitor knows at 10:00 am at the visitor center in town that their tour will not be until 4:00 pm, they will be able to visit the Kerbyville Museum, the wineries, the area stores, and have lunch in town, before heading up the mountain. This could increase the tourist dollars received in town instead of just being the "gateway". Families will also be able to make decisions on child care and leave their child for only a minimum amount of time once a reserved tour time had been scheduled.

1 My only reservation, however, is that I would like to see part of the lower Chalet reserved as gift shop space. Perhaps the front section from the archway could be made into a visitors center with displays and the back section and former child care area could be remodeled to hold a gift shop for the concessionaire. Gift sales are important to the park visitor and will also be important to the concessionaire's revenue. I would hate to see the atmosphere of the historic Chateau suffer from renovating the dining area into a gift shop which can be secured when closed. I am also reluctant to see the only "fine dining" atmosphere lost from this valley. Many area residents enjoy a special dinner in the Chateau on various occasions which

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Letter 65: Cheryl J. Davis

1. The public and the NPS have clearly identified a need for a visitor center or orientation facility on the Monument itself. Limited suitable space is available for development of a new visitor center facility due to the steep terrain and topography of the site. Also, direction from both the Congress and the public is that we limit development of new buildings on NPS sites when suitable alternatives exists. This is both to reduce development costs and reduce the number of buildings on site that impact natural resources. Adaptive use and restoration of existing facilities is a way to meet those objectives. The Chalet is a logical choice for a visitor center. It is ideally located for visitors wanting to take a cave tour. It allows for adaptive use of an existing historic building and significantly reduces the costs and impacts of constructing a new building on the Monument.

   A responsibility of the NPS is to determine what services are necessary and appropriate in carrying out the mission of the NPS, as stated in the 1916 Organic Act. We have determined that while gift sales are an appropriate service for visitors, that function should not supplant the educational and interpretive purpose of the Monument. The proposal does not eliminate the gift sales portion of the concession business. It relocates it to a slightly smaller area of the Chateau. This area would be physically separated from the dining room so that there would be virtually no interaction between diners and gift shop patrons. Hours of operation of the gift shop and dining room are such that there would be only a short overlap of the two functions in any case. During daytime hours, when the majority of visitors use the gift shop, the coffee shop operates and the dining room is closed. There is actually a potential for increased traffic in both the coffee shop food service and gift sales area by locating these activities adjacently in the same facility. That concept is successfully employed by many park units and public and private cave operations throughout the country.

COMMENTS

1 occur in the summer (especially during the years a good chef is procured). There is no other local restaurant currently which serves three course meals with linen on the tables. It is a good experience for families also. My children are often complimented on their good behavior in restaurants which is a direct result of having had so many "dining" experiences and not just eating at the local pizza parlor. I urge consideration for a gift shop area provided to the concessionaire which would not be located in the lobby or dining room of the Chateau

It is unfortunate that the decisions of the local media and governing bodies are being swayed by the propaganda of the current concession management team and that facts are not being considered. From experience, I know that the concession is not the friend of the resource, except when exceptional dedicated personalities are involved. Even then it is a constant fight to rationalize programs which benefit the resource, but are not generating revenue for the corporate office. The concession is not the friend of the local tourist businesses. They would as soon keep all the dollars themselves. They are not involved in local organizations. They are not dependent upon getting along with their neighbor, but are an entity unto themselves. The decisions currently being made by the concession are made by people in charge who have no ties with the area, in fact they might not have been to the Oregon Caves in the last five years, if ever. I would like to know what the amount of loss in tax revenues will be by withdrawing the buildings from private ownership. Perhaps it is time for the county or city of Cave Junction to have a lodging tax to generate revenues. The concession without cave tours will still market and promote the Oregon Caves as a tourist destination. It will still produce a brochure and be listed in AAA. Perhaps if they are no longer the same concession as at Crater Lake they could no longer ride on the shirt-tails of Crater Lake's promotion, however, something mutually beneficial might be worked out. I've seen to many ebbs and flows in the advertising of both parks by the concessionaire during the last 14 years to believe in the benefit of any of it. Visitation is still declining. Larger stories like the restoration article which was in Sunset, or the upcoming article in OMNI, or the Bill Nye episode on caves will do more to encourage visitation than billboards in Medford and O'Brien.

2 As you make your management plan for the immediate future, protect first the resource for the enjoyment of those yet to come and visit. Second, restore and protect the historic value and integrity of the Chateau. Preserve the Kaiser's and the Monterey furniture and the atmosphere of stepping back in time which can rarely be found.

With Regards,

Cheryl Davis

Cheryl Davis

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RESPONSES

1. Fine dining will not be a requirement in a new concession contract. It will be the option of the successful bidder of a new prospectus as to the specific menu that will be offered. While fine dining may be appreciated by some, it is not an essential service for operation of the Monument. We have consistently been told by Monument concessioners that this element of the operation represents their greatest costs (and losses.) A very small percentage of visitors that come to the Monument participate in fine dining. In fact, their is some evidence to indicate that such an operation is actually deterring a large number of typical visitors from using food service. Many families coming to Oregon Caves for a tour find it discouraging that only $15-20 entrees are available to them after the coffee shop closes in the afternoon. NPS will use its oversight of the concession contract to encourage an operator to provide quality, reasonably priced meals that appeal to the majority of visitors to the Monument.

2. The NPS will attempt to acquire, where possible, all of the historic furnishings associated with the Chateau. These furnishings are elements that contribute to the Chateau's designation as a National Historic Landmark. The furnishings would continued to be used by a concessioner as part of the operation of the Chateau.

COMMENTS

Oregon Caves General Management Plan March 7, 1998 L-595
National Park Service
Columbia Cascades Support Office
909 First Avenue, Suite 500
Seattle, Washington 98104-9882

To whom it may concern,

After reading the Oregon Caves National Monument DGMP and EIS, which was very well written, compared to some others, I consider Alternative C to be the best plan overall for one of Southwest Oregon's most striking features. With a mission of protecting the natural resources placed above profit, the Monument has the potential of becoming more desirable to tourists, as the resources heal from a past of being "loved to death".

With Port Orford cedars dying from disease in an ever increasing area, it is most important to protect healthy stands. I commend the Park Service for proposing to expand the boundaries of the OCNM. This is such an outstanding area that we are fortunate to live in. It can take a lifetime to understand how it came to be, and how all of the separate parts work together. It is futile to truly protect a mere 484 acres, because of outside effects. A large area with old-growth forest intact will be experienced and enjoyed by people who wouldn't have had the chance before.

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Now that we know there are Pleistocene fossils within the OCNM it is even more important to provide protection of resources. Reading about the fossils found in the caves, filled a gap, a hunger for knowledge about this area's past. I hope that someday there will be a museum collection on display at the OCNM of the fossils and examples of different types of mineral formations.

I don't see changing the management from a concession to Park Service as "loosing" local jobs, but as getting a new boss. It doesn't have to be an "us versus them" attitude. We and our government are meant to be one and the same. The Student Intern Program sounds good. It makes sense to hire local people as much as possible, because they would already know more about this area. Even if young people go away to school, some would like to come back, if there are jobs. Regardless of where the employees are coming from, security against theft and vandalism obviously needs to be improved.

The clearcuts so close to OCNM are an embarassment to some of us. It is shameful that we have let this happen. Some lessons take too long to learn.

1 If the signs directing tourists on 199 in Cave Junction, to the Caves, are difficult to see, please move the signs. The City of Cave Junction is just now learning to not top the street trees. Even though sweetgum aren't the best choice, they are

RESPONSES

Letter 66: Kathleen Lombardo

1. New signs would be an integral part of directing visitors to the reservation and information center that will be developed at the Illinois Valley Visitor Center. However, a balance must be struck between an adequate number of signs and a visual intrusion into the community of Cave Junction and along the approach highways. The NPS will work closely with the Oregon Department of Transportation to develop appropriate signing along the U.S. Highway 199 and Interstate-5 corridors.

planted, and that's all we have. Any business blaming a lack of customers on street trees hiding their signs, should try being more creative in placing signs where they can be seen, and be thankful for the shade that they provide. Nothing moves summer tourists out faster than a lack of shade. When Oregon's weather is at its warmest, night time tours of the Caves would be a memorable experience for people. 1

The Bigalow Lakes area looks like grizzly bears should still be ambling about. I hope that cattle grazing will be discontinued there. Since the SUF issued the outfitter guide permit for horseback rides to Bigalow Lakes, the horses have severely damaged the trail edges. All of those amateur riders have been unable to confine the horses to the trails, resulting in mudholes where there were wonderful plants. Old loggiung roads would be more appropriate places for horses, rather than mixing them with hikers.

If the Nicore mining project happens, it will affect tourism as a whole in the Illinois Valley. The purity of our air is already challenged, without all of the additional fine dust, which will drift up towards the Caves.

The surplus rooms and beds, which had been for staff; could they be converted to a lower rate guest housing, for groups such as students, or are they in uninsurable shape? 156

A small parking fee would provide more income, and a parking attendant could double as security, during peak season.

Thank you for letting me share my thoughts about such a magnificent natural resource. Please give it all the protection it deserves.

Sincerely,

Kathleen Y. Lombardo

Kathleen Y. Lombardo

BY FAX
March 13, 1998

Superintendent Craig Ackerman
Oregon Caves National Monument
National Park Service
Columbia Cascades System Support Office
909 1st Ave Ste. 500
Seattle WA 98104-9882

Dear Mr. Ackerman:

We are writing in support of the PREFERRED ALTERNATIVE C for expansion, interpretive services and management of the Oregon Caves National Monument.

Specifically, we favor the National Park Service providing direct interpretive services at the Cave including all tours of the caves themselves. We also favor expanding the Caves land base AND to specifically include headwaters and streams that feed the park water supplies. We believe the Monument is too small to adequately protect and preserve the natural features and provide the best possible experience to visitors. We strongly favor transferring the recommended 3310 acres from the Forest Service to the National Park Service. This is an insignificant sliver of the Siskiyou National Forest's total land base.

We have traveled extensively in the United States and visited more than 75% of the U.S. National Parks and Monuments. Some are obscure and not on the common beaten paths. We view all these parks as our national treasures to be protected and their stories interpreted to the public. We believe the National Park Service is best suited to discuss and interpret the national heritage these parks represent. We want the National Park Service to use its own interpreters to discuss the national park service, their mission, and issues we face as a country to protect these scenic, natural, scientific and historic resources.

We have been on the tours at the Oregon Caves, and while the guides have been pleasant, we have found the tours to be more of a "Disneyland" experience rather than well founded in scientific and natural resource fact.

1 The National Park Service is charged with responsibility to protect and interpret our national park resources. We want National Park Service personnel to conduct all interpretive programs. The pubic have strong feelings of affection and support for our

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Letter 67: Martin and Catherine Seybold

1. The National Park Service will incorporate the mission and purpose of the NPS, as well as that of the Monument, into interpretive themes and programs. Cave tours will relate how the caves fit into the overall role and resources of National Park system areas as well as the importance of protection and preservation of resources at this particular site.

national parks and expect National Park Service interpreters to provide the interpretive story at their parks. We would also welcome more explanation as to "why the National Park Service exists" and natural resource issues to be woven into this and other interpretive presentations. 1

An expansion of the Oregon Caves land base, and provision of interpretive services directly by NPS personnel will be in our best interests to preserve, protect and interpret Oregon Caves National Monument.

We do not believe Alternative C will have a negative impact on the local economy, in fact, we believe it will strengthen the local economy by attracting additional visitors. If nothing else, the caves will be visible on a road map!

We strongly support implementation of PREFERRED ALTERNATIVE C.

158 Sincerely,

Martin and Catherine Seybold

COMMENTS

Superintendent
Oregon Caves National Monument
19000 Caves Highway
Cave Junction, Oregon
97523

RECEIVED
MAR 20 1998
OREGON CAVES
NATIONAL MONUMENT

March 5, 1998

RE: OREGON CAVES NATIONAL MONUMENT DRAFT GENERAL MANAGEMENT PLAN / EIS

Dear Mr. Ackerman:

I have read the Oregon Caves National Monument Draft General Management Plan and Environmental Impact Statement with great interest. It is a very disappointing document to me and I think substantial correction and revision is in order. I have a strong concern that the authors either did not understand or chose to disregard the stringent management direction that applies to National Forest Lands around the Monument. There are also numerous technical errors. Proposals to expand the Monument area are simply not scientifically supportable. My specific objections are as follows:

1. It fails to describe an ADEQUATE RANGE OF ALTERNATIVES. One of the most obvious and viable alternatives would be to transfer administration of the Monument from the National Park Service (NPS) to the United States Forest Service (USFS). As the sole administrator of all the surrounding lands, the USFS is in a better position to efficiently administer the Monument than the NPS. With administrative responsibilities for nearby Congressionally designated areas such as the Smith River National Recreation Area, Newberry Crater National Monument, Mt. St. Helens National Volcanic Area and Columbia Gorge National Scenic area to name a few, the Forest Service should be considered as a potential administrator for the Caves Monument also. 159

2. It fails to address the PROBLEM OF LANDSLIDES ON THE ACCESS ROUTE to the Monument. These landslides were evident during the 1964 floods and have been a chronic problem ever since then. During the last two seasons, the State has been fighting a losing battle to keep the highway open during the winter months. It is evident that the problem could get much worse and that a massive infusion of engineering and dollars may be needed to provide safe and adequate access to the Monument. But the problem is only superficially addressed in the planning document. 2

3. The document fails to adequately address the LOST ECONOMIC AND SOCIAL VALUES ASSOCIATED WITH PROPOSALS TO EXPAND THE MONUMENT BOUNDARY. Uses such as hunting, berry picking, motorized trail use, mushroom picking, recreational gold panning and dispersed camping all have a long established history in the surrounding National Forest lands. Many of these uses would almost certainly be barred by NPS administration in the expanded area of several alternatives. What are the lost economic (dollar) and social values associated with such a change? The NPS needs to be specific concerning what uses would or would not be allowed. The NPS needs to reveal what uses it would recommend to the Congressional delegation under any proposed legislation. 3

4. UNSCIENTIFIC INFORMATION AND OPINION TREATED AS FACTS. The document is riddled with statements based on unscientific literature from special interest groups. Examples include the Headwaters Journal, High Country News, Wild Fish 4

RESPONSES

Letter 68: Michael F. Cooley

1. Please see the Alternative chapter, Alternatives Considered but Rejected, item 11.

2. The problems of landslides on the access route to the Monument is outside the scope of the GMP/EIS.

3. The boundary proposal affects only 0.3% of the land area within the Siskiyou National Forest. Use of the other 99.7% of the forest for the purposes listed would be unaffected. There would not be a significant impact on the availability of those uses nor a consequent measurable impact on economic values to the region. Some of the uses listed, such as gold panning, are minimal or non-existent within the proposed area. Other uses would continue under NPS administration. In the proposal dispersed camping, fruit and berry picking for personal consumption and horseback riding would be permitted while mining, hunting and motorized use of trails in critical watersheds would not.

4. Development of the GMP/EIS requires the NPS to look at other sources of information outside of federal agencies. Failure to incorporate some of these findings into the GMP would leave the NPS vulnerable to criticism from other professionals and experts who may differ in opinion from "agency professionals and experts".

5. Costs for staffing of cave tour operations would be offset by collection of fee revenues. No additional impact on the federal budget is expected. (see NPS response to concessioner, Letter 15, Newspaper ad #3).

COMMENTS

4 and Forests (Wilderness Society), News from the Sierra Club Legal Defense Fund, Letter from Rogue Group Sierra Club to Applegate Ranger District, and others.

5. FAILURE TO UNDERSTAND AND CORRECTLY INTERPRET SCIENTIFICALLY BASED DIRECTION AND POLICY FROM THE NW FOREST PLAN OF THE FOREST SERVICE. The document references Riparian Reserves, Late Successional Reserves (LSR's) and the Aquatic Conservation Strategy (ACS) which all came from the NW Plan. However, it is highly evident that the author(s) of the Monument Plan had only the barest understanding of the scientific efforts that went into the formulation of these strategies or how they would work to protect and enhance forest natural resources. In fact, statements about the potential for clearcutting, roadbuilding and logging in National Forest Areas surrounding the Monument lead me to believe that the authors have no concept of current management direction on these lands. My impression is that the NPS was trying to portray the LSR's as high production timber management areas. Nothing could be further from the truth. I give the NPS an "A" for including terms from the NW Forest Plan in the text and index. But I give it an "F" for understanding what the terms meant.

6. FAILURE TO EXPLAIN WHY THERE HAS BEEN NEARLY A 40% DROP IN PUBLIC VISITS TO THE MONUMENT OVER THE LAST TWO DECADES OR HOW THIS INFLUENCES THE FORMULATION OF ALTERNATIVES. I consider an understanding of this situation to be critical to any future management decisions made about the Monument. How can the NPS justify expansion of the Monument if use has leveled out and may actually be decining. I think the document should include projected use statistics as they relate to various alternatives.

5 160 7. FAILURE TO JUSTIFY PROPOSALS TO INCREASE NPS STAFF AT THE MONUMENT IN LIGHT OF DECLINING FEDERAL BUDGETS.

8. VISUAL AND SCENIC INFORMATION. One of the most distressing parts of the document are the sections that discuss management of the scenic resource under the alternatives. It misses the very important fact that scenery around the Monument will improve under ALL of the alternatives. It treats the existence of old harvest units that CANNOT BE SEEN FROM WITHIN THE MONUMENT as though the units are distracting to Monument visitors. An example of this is evidenced by the insert aerial photograph on page 112. The document also fails to point out that most of the surrounding harvest units are 10 to 30 years old and could not be implemented under today's highly restrictive land management allocations. Mention is made of the Sugarloaf and China Left timber sales as though they followed current protocols rather than specific legislatively mandated exceptions to management direction in Late Successional Reserves. No mention is made of the harvest units that were cancelled in the the China Left sale because they are in LSR's. The bias of the author's of the visual and scenic sections of this document is so evident in the way the real situation is distorted, I can give it no credibility at all.

6

9. A REFERENCE TO HERBICIDE USE ON NATIONAL FOREST LAND AS THOUGH IT WAS A STANDARD VEGETATIVE MANAGEMENT TECHNIQUE (pg 8). I believe this is a scare tactic used to dramatize the potential for chemical intrusion into the environment. The truth is that herbicide use has been almost non existent on National Forest land for more than 15 years and is not likely to ever return.

RESPONSES

6. One of the planning team's goals was to understand the history of resource use surrounding the Monument and the future impact that the designation of Late-Sucessional Reserves in the *Northwest Forest Plan* would have. The NPS understands that there will be some visual improvement in all the alternatives over time. However, the impacts of potential future salvage, thinning operations, and road construction is still unknown at this time. In addition, many of the older clearcuts will have difficultly regenerating due to the poor soils, steep slopes, and low rainfall. During our public scoping for the project, clearcutting and harvesting activities around the Monument was clearly identified as an issue. The visual analysis was done as a planning tool to assess any future timber activities, such as salvage, or thinning that may impact the scenic quality of the Monument in the future.

7. Please see Alternatives chapter, Alternatives Considered but Rejected section, item 3.

8. The boundary expansion was based upon several justifiable factors, not just the impact on the surface water supply.

9. The original, easily viewed marble formation has been mapped to the satisfaction of early mappers, but leaves much to be desired by current geological standards and curious geologists. Geological mapping done over the last ten years has done much to expand the complexity of the Monument's geological units. Even though a known extent of the area is mapped, there is no reason to assume it is complete and accurate, especially in the geological resource as complex as the Siskiyou/Klamath mountains.

10. Please see NPS response to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

11. Hunting is not allowed in the present Monument. The NPS has specific policies stating that no hunting will be allowed in national park units unless specifically authorized in the legislation. There is also a safety issue for visitors at national parks.

COMMENTS

7 10. FAILURE TO ADEQUATELY EXAMINE ALL REASONABLE ALTERNATIVES FOR PROVIDING A SAFE POTABLE WATER SUPPLY. The truth is that the surface supply water system currently used by the NPS can NEVER be made completely safe. There is simply no way to prevent some contamination of a surface supply water system by animals and to some degree, people. This is the reason for laws that require surface supply systems to be treated. The NPS quickly discounted wells as impractical because of low predicted water production rates. Wells ARE a viable alternative. Low production rates just mean that water storage needs to be part of the system.

8 11. FAILURE TO JUSTIFY EXPANSION PROPOSALS THAT EXCEED THE DRAINAGE AREA OF THE WATERSHED ABOVE THE SURFACE SUPPLY WATER SYSTEM INTAKE. The actual area that drains into the water intake is only a small fraction of the expansion area proposed in ANY of the expansion alternatives.

9 12. FAILURE TO JUSTIFY EXPANSION PROPOSALS THAT EXCEED THE DRAINAGE AREA THAT COULD POTENTIALLY HAVE AN EFFECT ON THE CAVES. The mineral resource that gave rise to the caves has been carefully mapped and its location is displayed in the EIS. There is a known area of water flow that could potentially contact this mineral resource and influence the caves. It is a small area; much smaller than the area in any of the expansion proposals.

10 13. PROPOSALS TO ELIMINATE CONCESSION SERVICES IN THE MONUMENT AND TRANSFER THE DUTIES TO THE NPS ARE ILLOGICAL, EXPENSIVE AND SELF-SERVING. There is no evidence anywhere in the document that the concessionaire has provided anything but acceptable public services to the public. Yet because the employees of the concessionaire are private rather than NPS employees, the NPS proposes to take over these services itself. This direction defies logic in my view. The current Monument staff should be praised for developing a sound private business opportunity at the Caves. The fact that this is the only NPS unit using a private concession for tour guidea is an accomplishment to be proud of not to change.

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11 14. FAILURE TO DEVELOP AN ALTERNATIVE THAT UNCONDITIONALLY RETAINS HUNTING AS A USE IN ANY EXPANDED AREA TO THE MONUMENT. Hunting is one of the most important recreational pursuits in areas that have been considered for expansion in the Plan. Some of the largest trophy blacktail deer in SW Oregon have been taken from areas around the Monument. This could well be because the soils contain minerals that contribute to large antler growth. The Sugarloaf and Bigelow Lakes areas are renowned for their deer hunting opportunities. Any loss of this use would be a significant loss to the hunting public.

12 15. It is stated on page 2 that the original withdrawal for the Monument in 1907 contained 2,560 acres but the ultimate acreage became 480 acres. The statement makes it sound like this was an error. Isn't it true that the 480 acres was all that was considered necessary to meet the objectives for having a National Monument in the first place?

13 16. It appears that the Monument Staff recommended a boundary extension to the Regional Director in 1939. In 1949, a "multi-agency" Boundary Study Committee evidently again recommended boundary extension. As near as I can tell, both of these recommendations were rejected by the NPS at the Regional and/or Washington level. Why is the same issue being raised again? Isn't it fair to assume that protection for watershed and scenic values is far greater

RESPONSES

12. The 2,560 acre withdrawal was temporary pending a surface survey, something that was conducted in October 1908. The surveyor's sketch map became part of the July 1909 Presidential proclamation establishing Oregon Caves National Monument, but neither it nor the proclamation explained why 480 acres represented "the smallest area compatible with the proper care and management of the objects to be protected" as per language in the Antiquities Act. The surveyor's report mentions that water on site is "sufficient for domestic use of campers and any officer in charge," but offers no explanation about how 480 acres might protect "the beauty of these caves" from being "destroyed by vandals and lost to the public forever." On his sketch map there is a ridgeline that fits within the established corners, with perhaps the inference being that the cave system fit between the ridgeline and the entrance where Cave Creek emerges. This is supposition, of course, because in 1908 it was impossible to do sufficient subsurface mapping in order to meet Congressional intent behind the "smallest area" provision in the Antiquities Act.

13. The Superintendent of Crater Lake National Park recommended a boundary extension for the Monument to the Director of the NPS in 1939. There is no record of this recommendation being "rejected." Two years later the Director initiated a study of the proposed "Port Orford Cedar National Monument," an investigation which had, as one alternative, a boundary extension for Oregon Caves National Monument. After World War II, the same Director saw a boundary extension of the Monument as the most feasible way to meet three objectives: insure safe water by including the Lake Creek drainage within the Monument's boundaries, provide adequate space for administration of the Monument, and preserve a tract of Port Orford cedar. An interagency committee consisting of NPS, USFS, and BLM representatives recommended a tract that roughly corresponds to the boundary extension in the current preferred alternative. The 1949 interagency recommendation was endorsed at the regional and Washington levels of the NPS and became the basis for bills introduced to Congress in 1955 and 1958.

Also, Public Law 95-625 requires the adequacy of park boundaries to be fully evaluated when general management plans are prepared for units of the National Park System. The boundary change incorporated in the Proposed Action provides a topographic based modification which will assist Monument managers in the future protection of Oregon Cave resources.

COMMENTS

13 on National Forest Lands today that it was when these older recommendations were made? Why then is the same kind of recommendation being made now? When the horse is dead its time to get off.

17. A statement on page 5 says "the native vegetation and fauna may become increasingly significant for scientific studies as the surrounding national forest land is logged for timber or utilized in other ways under multiple use management". The implication of this statment, of course, is that all the surrounding land is going to be changed by timber harvest or other extractive activity. This is a very distorted view of real conditions in the lands that surround the Monument. What percentage of National Forest Land on the Siskiyou National Forest are open to regenerative timber management practices under current legislative and policy direction? How does this compare with a decade ago? Why would a 480 acre Monument which receives approximately 100,000 visitors per year be a good place for scientific studies of vegetation and fauna? Doesn't this concentrated use tent to detract from the value of the area for research purposes?

14 18. STATEMENT ON PAGE 9 THAT SAYS SURROUNDING NATIONAL FOREST LANDS ARE MANAGED "WITH AN EMPHASIS ON TIMBER PRODUCTION" IS SIMPLY NOT TRUE. In fact,only 7% or less of the lands on the Siskiyou National Forest are managed primarily for timber production.

19. A statement on page 9 says that "harvesting activities" are still permitted in Late Successional Reserves (LSR's). I believe a clear explanation of the exact purpose and nature of such harvesting activities needs to be provided. What are the goals of such activities? How frequently would they occur? How would they differ from timber harvest in Matrix and General Forest Areas? What are the Standards and Guidelines that would apply to such activities in LSR's?

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15 20. If cave interpretation by other than NPS staff is a "direct conflict with NPS management policies" (pg 10), why is it permitted in the first place? I cannot believe that the NPS does not have very tight control over the content and presentation of interpretive programs by the concessionaire. Is there an annual operating plan that is approved? Are interpretive programs reviewed by NPS personnel? What are the "changing resource protection and visitor needs" that cannot be addressed satisfactorily by concessionaire personnel but can by NPS employees?

21. A statement is made on page 17 that under Alternative A, "visitors would continue to observe clear-cut areas in foreground and middleground views from within the Monument's developed area and trails". I assume you mean "existing" clearcuts. True? Can the average visitor discern clearcuts from natural openings? What will happen to existing clearcuts around the Monument over time? Does this situation vary with any of the alternatives?

22. The second paragraph under Monument Boundary on page 20 seems to be a thinly veiled accusation that LSR management continues timber practices developed in the past. Nothing could be further from the truth. My impression is that the authors really have no understanding of the management goals and practices allowed under the LSR allocation. The paragraph needs to be substantially rewritten.

RESPONSES

14. The statement has been amended.

15. Please see NPS response to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

16. Please see NPS response to Letter 15 sent by the current concessioner, the Oregon Caves Company and their parent corporation, the Estey Corporation.

17. The monument's proposed expansion would be legislatively withdrawn and transferred to NPS. The effect of withdrawn would prohibit new entry under the mining and mineral leasing laws. The proposal will be subject to current valid existing rights, including mining claims. The proposed Monument expansion may encompass one located mining claim.

18. In the Alternatives chapter, the "Estimated Operating Costs" heading has been changed to read "Operating Costs".

19. Language has been clarified in the document to address motorized use. In Alternative D, motorized trail use would be permitted in the protected area in accord with SNF policies, not within the proposed expanded Monument boundary.

COMMENTS

23. On page 21 there is mention of a "Protected Area" on National Forest Land which surrounds the monument. Exactly what is the difference between this proposed area and the uses that are currently allowed in this area? I would like to see the differences displayed in a matrix so they can be quantified. The comment that visual impacts from "predominantly logging" (page 24) seems exaggerated considering current management allocations in LSR's.

16 24. Under what legal authorization can the NPS retain receipts from cave tours if they are conducted by NPS personnel? How much of these cave tour receipts would be offset by the higher cost of NPS interpreters compared to private?

25. On page 28 the protected area around the Monument in Alternative B is justified partially as a means of protecting foreground and middleground views from the Monument. Why is such protection needed with LSR designations completely surrounding the Monument? It seems completely unnecessary.

17 26. Please explain how "mining would be excluded from within the Monument under existing statues and regulations" for Alternative C (pg 32). Would the area be legislatively or administratively withdrawn? How many claims would be affected? What is the level of activity (if any) of these claims in the last decade? Would validity examinations be necessary to vacate the claims? What would be the result if a claim was found to have Valid Existing Rights?

27. Is it the intent of the NPS to ask for a ban against hunting in the Monument expansion if Alternative C is selected? The point is not clear in the text. The effect of Alternative C cannot be ascertained without this information.

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18 28. I would like to see a table for Estimated Operating Costs developed and include for Alternative A, No change. Such tables are included for all of the other alternatives. Without such information it is difficult to understand how costs would actually change from the present. I suggest that a matrix be developed and included in the Final Environmental Impact Statement.

29. Alternative D involves use of a nonprofit institute, cooperating interpretive association or other similar entity to augment the NPS at the Monument. This might be a realistic alternative if the Monument was near a city or other populated area. But for the Caves I think its totally unrealistic. How many entities like this did the NPS contact prior to formulation of this alternative? How many showed interest in volunteering as the entity? I do not believe Alternative D is viable unless the NPS can demonstrate active interest from several outside groups in serving as the hypothetical entity. I believe the alternative is just "filler".

30. Alternative D involves year-round guided cave tours yet only a small fraction of the visitors to the Monunment occur outside the summer season. At what point does visitation drop so low that tours are "unprofitable" for the concessionnaire or unrealistic for the NPS? Would you plow snow to keep the road to the Monument open? To what extent has recent flood damage to the Caves highway affected winter access?

19 31. It is unclear to me if any motorized trail use would be allowed under Alternative D. If not, how much use would be affected? This information is

RESPONSES

20. The strategy to close an area to mineral entry by special withdrawal within the national forest is a proposal. A final decision would have to be made by the Department of Interior and would be subject to valid existing rights. Language in the text has been changed to read, "It would be recommended that this protected area would be withdrawn and closed to mineral entry...".

21. The table, Summary of Actions for Each Alternative, has been amended to more clearly reflect the differences in "protection" as defined by the USFS and NPS.

22. Please see the preceding General Comments with NPS Responses (item 5) in the Written Comments and Responses section.

COMMENTS

19 critical to an analysis of the effects of Alternative D or any other alternative that would ban such use.

32. It appears that the only animal use allowed in Alternative D would be horses on trails. What about dogs? Would they be banned from the expanded area? How about Llama's on trails? This information needs to be presented for other alternatives as well.

33. Alternative D (pg 53) states that "hunting restrictions would be extended to lands added to the Monument". How much use is involved? Please refer to other questions I have already listed about this matter.

34. How does an alternative "extend viewshed protection" when the areas involved are "already" in National Forest LSR's and Retention visual areas? How does the NPS conclude that expansion will change the current situation at all? You can see many miles from the mountain tops along the expansion boundary. How will areas in the background from these points be affected?

35. How does the 700 persons per day carrying capacity for the Caves under alternative D (pg 58) compare with present carrying capacity?

36. A statement on page 59 says "It would be further recommended that any timber harvesting permitted within the protected area would be managed under USFS guidelines for full visual retention as seen from the viewpoints within the Monument". If the protected area is transferred to the NPS what validity would USFS guidelines have to its management? If the reference is to areas "outside" the monument, how far do the restrictions run and what is the affect on allowable harvest level, if any?

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20 37. There is a statement on page 59 referring to mineral withdrawals. It says the "area would be withdrawn and closed to mineral entry". I believe it is a reference to areas outside the expanded area of the Monument still under USFS jurisdiction. I do not believe the USFS is empowered to make mineral withdrawals. That authority rests solely with the Department of Interior. The USFS can only make a recommendation. Also, you should point out that withdrawals do not affect claims that are determined to have Valid Existing Rights at the time of withdrawal.

21 38. The table on page 63 implies that the Monument's public water supply is not protected under alternative A, No Change. If that were the case then the water supply should be immediately shut down. The fact is that the water supply is fully treated and must meet all state and federal water quality standards before it can be used for the public. There are rigid testing standards that are in place to insure that the water supply is safe for public consumption. I believe the term you want to use is "closed to public entry". However, that fact alone does not in any way by itself insure a safe water supply. The Forest Service manages over 900 public watersheds nation wide. The vast majority of these are open to public use.

39. The table on page 64 leads me to believe that the authors of the plan do not understand the protection afforded scenic resources by present USFS land allocations. To imply that the foreground is not protected is simply not true.

RESPONSES

23. Text has been changed to clarify this statement.

24. The sentence is correct. The information regarding the number of operating plans was quoted from Siskiyou National Forest's current *Land and Resource Management Plan*.

25. This statement merely documented for this required NEPA section that the NPS is aware of the existence of some active placer mining operations in a nearby area to the "affected" lands. The statement was not intended to imply the need for formal validity determination by the SNF of any of the mining claims, but simply to report the NPS staff's understanding of the current mineral activities and the SNF staff's administrative record.

26. The sentence is correct. The quote you mention was taken from the USFS document entitled the *Grayback/Sucker Pilot Watershed Analysis*, Siskiyou National Forest, April 1995. It can be found verbatim in the Watershed Overview section, page 01, and is the first sentence.

27. The table has been amended to read "views enhanced" instead of "views protected".

28. The paragraph was amended.

COMMENTS

22 40. It would appear to me that the biggest influence on the cave resource is direct human use not activities that occur far outside the Monument boundary. If the overriding consideration is preservation of the Cave Resource, why hasn't the NPS looked at an alternative that drastically cuts back human use? This seems like a significant weakness in the range of alternatives developed.

23 41. There is a statement on page 76 that "the Monument's forest types are not well represented elsewhere in preserve status". Where did this statement come from? I doubt its scientific validity. How many acres of similar vegetative types occur within a 50 mile radius of the Monument? How much of this is in a protected status under existing management plans? Perhaps my confusion is with the word "preserve". What exactly do you mean by it? Do Wilderness areas, Botanic Areas, Wild and Scenic Areas, National Recreation Areas or LSR's qualify?

42. What is the extent of mushroom harvesting that occurs in areas under Alternative D that would become part of the expanded Monument? What is the economic value of this activity? What is the social value? How many people are typically involved in a given season? The Plan says on page 78 that the Superintendent could allow mushroom collection under certain certain circumstances but that no research has been done to support any conclusions about this. What does that mean? When would the research be done? What there be any use allowed until this undefined research was done? This information should also be displayed for other alternatives that might ban the activity.

165 43. Page 83. What factors lead to the transfer of the Monument from the USFS to the NPS in 1933?

44. Page 101. Is the Outfitter guide permit for horseback riding in the Bigelow Lakes area still active?

45. Page 103. It seems presumptuous to imply that land allocations exist at the whim of the administration. There is a legal process that must be followed in changing management direction. Ultimately, it is the will of the american people that sets management direction. If anything, it is likely that environmental awareness will only increase over time and with it the protection of all forest resources.

24 46. Page 108. The NPS should verify the figure concerning the number of mining operating plans that are "received each year" by the SNF. Far less than 100 are received. I believe the NPS may have confused operating plans from notices of intent. There is a significant difference in the kinds of operations they represent.

25 47. Page 109. There is a "presumption of validity" that is associated with all claims located outside withdrawn areas. The statement that "there are unpatented claims that have never been terminated or validated within a four mile radius of the Monument" indicates that the author did not understand what he or she was writing about.

26 48. Page 110. I would challenge the statement that the Grayback/Sucker watershed "has been the most important watershed on the SNF for recreaton use for dispersed (scattered, undeveloped areas) and developed (established

RESPONSES

29. The text has been changed to read the Monument is *part of* a regionally and nationally significant ecosystem.

30. The total estimated jobs created by this alternative include both full time, part time, and seasonal and are not full time equivalent (FTE). The total includes both jobs created by the tourism sector, jobs created from direct and indirect expenditures by the Federal Government on salary, equipment and supplies, and job creation by the expenditures of other entities on Monument related activities. These figures reflect the total benefit in job creation by the presence of Oregon Caves National Monument. Currently, as represented by the No Action Alternative, the operation of Oregon Caves results in a total of 198 jobs, implementation of Alternative B represents the least with 188 jobs, and Alternatives C and D, 230 and 222 respectively. One can therefore compare the relative affect of the four alternatives and conclude that implementation of Alternative B would result in a somewhat lessor employment benefit over the existing situation, and the implementation of Alternative C or D a slightly improved employment benefit over the existing condition. Given the relative small difference between the estimates between the four alternatives, it can be concluded that the differences between any one alternative is relatively minor, with the possible exception of Alternative B which would actually result in some job loss (10 jobs) over the existing situation. Most of this would be attributable to the loss of concession lodging, food and gift sales services at the Monument under this alternative.

26 facilities) recreation sites. The Lower Rogue River area of the SNF gets far more use of both types.

27 49. Page 115 and 116. This table is misleading. Its problem is that "protection" is equated with "preservation" or NPS managment. I would hold that protection can be afforded with a great deal of change if it is implemented carefully. In some cases rehabilitation may even be better than preservation. There is more than one way to do it.

50. I have toured the caves with tour guides provided by the existing concessionaire. I found them to be extremely professional, extremely knowledgeable and very public service oriented. I doubt that most people would even know that they are not direct employees of the NPS and frankly I don't see what difference it makes. The NPS's desire to take over this activity seems to be driven by ego more than public service.

51. Page 126. Is offering tours a "minimum of five times a day" during the winter realistic considering that 80% of the visitation to the Monument occurs during June to October?

52. A statement is made on page 131 that "the NPS would not take any action under any alternative that would result in an adverse effect on resources of special concern such as sensitive species of plants and animals and wetlands". I find this to be a somewhat unrealistic statement. The simple presence of people portends some degree of adverse effect on flora and fauna. But there is an acceptable level which we tolerate because of the public benefits.

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53. A statement on page 133 predicts that "increased run-off and sedimentation resulting from SNF logged areas adjacent to the Monument could enter the watershed system of the cave and possibly alter its ecology". This seems a rather unjustified statement considering the land management allocations that exit on these surrounding lands. This section should focus on the "differences" between alternatives. How does this possible effect vary from alternative to alternative?

28 54. I strongly object to the statement on page 133 that says "cross pollination of this stock with old growth stands inside of the monument boundaries may strongly impact the genetic integrity of future forests in the Oregon Caves watershed". I challenge you to produce the scientific evidence to support such an outlandish claim!

54. Another statement on page 133 says "there would be limited protection to the adjacent watersheds containing watersheds Karst geology". This statement is almost as outlandish as the one I quoted in comment 54. The author obviously does not understand the management allocations that apply to land around the Monument. If the statement cannot be supported with scientific evidence it should be removed from the text.

29 55. Page 134. I agree that the Monument lies in an ecologically diverse and complex forest region. But to claim that the forest ecosystem of the Monument is "regionally and nationally significant" is a great overstatement. The ecosystem in the Monument is replicated over vast acreages outside the Monument's boundary.

31. The estimate of $7,460,000 is the total of the stimulated economic benefit attributable to the implementation of this alternative from the combined effects of visitor expenditures, Federal Government expenditures, and other expenditures in the area by non-local entities. The estimate is derived from formulas applied to each of the plan alternatives based on the IMPLAN economic impact model developed by the U.S. Forest Service. This model is utilized nationally by the National Park Service as a guide to assist NPS planning and management personnel in assessing the general economic affects of National Park System areas within a given region. It is provided for comparative purposes to assess the relative economic affect of implementing one alternative or another.

Three principal economic benefits are derived from these estimates; new capital construction financed with out-of-region funds, NPS, concession and cooperating association payrolls, and tourist spending by out-of-region tourists. These three components vary from one alternative to another, depending upon the individual actions or precriptions. Factors such as the amount of new construction and staffing levels do vary by alternative. For example, alternatives C and D provide for new construction within the Monument where a portion of construction wages are invested locally, along with some additional NPS and cooperating association staff salaries, much of which are invested locally for goods and services. The estimate of economic benefits provided includes both direct effects and indirect effects. Direct effects include the goods and services that would be purchased directly from businesses located in the general region. Indirect effects represent the additional sales/output produced in the region from the spending cycles that occur from the original expenditure. Regarding the area of economic benefit, it includes the entire Illinois Valley Region along U.S. Highway 199 up to Grants Pass , not just the small area between Cave Junction and the Monument.

29 56. Page 134. The section on Scenic Resources fails to address the "differences" that exist from alternative to alternative.

57. Page 137. The authors tried to equate the low level and infrequent harvest activities that could conceivably be allowed in LSR's with "full scale logging operations". This is a great distortion of facts and leads me to believe again that the person(s) that wrote it were more interested in condemning the USFS than getting their facts scientifically correct.

58. Page 147 to 149. The whole premise of the section entitled "Effects on Natural Resources Under Alternative C" is that adverse effects from mining, grazing, and timber harvest will be permitted under USFS administration and are always harmful. To what extend are these uses allowed under present direction? To what extent do they actually occur?

59. On page 152 and 153 a statement is made that Alternative C will provide the highest positive economic benefit to the economy of the communities in the Illinois Valley and the State of Oregon....". Your economic analysis does not support this conclusion. Increased investment in government salaries seems like a rather farfetched positive economic consequence considering that there will be a decrease in private salaries under alternative C. Also, although I disagree that timber harvests will be significantly different in Alternative C that Alternatives A or B, if they do, then there will be less revenue returned to the local county in lieu of property taxes.

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30 60. On page 161 a statement is made that there will be a "combined benefit of jobs created" of 222 under Alternative D. I can find no documentation to support this projection. Are these Full Time Equivalents (FTE's)? It seems like a very excessive projection considering that only 20 FTE's are shown as the entire staffing need for the NPS under Alternative D. The figure needs to be justified or corrected.

31 61. On page 162 a combined annual wholesale and retail sales benefit to area tourism of some $7,460,000 is projected under alternative D. How was this figure generated? How does it vary by alternative considering that use of the Monument is not likely to change significantly by Alternative? How much of these moneys are actually spent at the monument or for services between highway 199 and the Caves?

I submit these comments strictly as a private citizen. They do not reflect any official position that might be taken by my employer, the USFS. Thank your for the opportunity to comment and good luck on developing a final plan that is acceptable to all interested parties.

MIKE & MARY COOLEY

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COMMENTS

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RECEIVED
MAR 12 1998
OREGON CAVES
NATIONAL MONUMENT

Dear Sir-

Regarding the *Draft General Management Plan.... December 1997*

I have reviewed the plan and find it readable as well as exhaustive in its content.

My interests are primarily historical and cave interpretation.

1 On page 1, I believe Poet Joaquin Miller visited the caves in 1907 rather than in "1904" cited. His first report of his adventure was in *Sunset* magazine in September 1909.

While attention is given to Elijah Davidson for his discovery of the caves, I did not find any comment that it was through the direct involvement and interest of Judge Chandler B. Watson (Watson's Grotto) that the acreage that became the National Monument was brought to the attention of President Taft, who signed the proclamation.

As to whether the NPS or a concessionaire should be leading the guided tours, and while I respect the NPS goal of handling the interpretation itself, I hate to see entrepreneurial enterprise stymied by government so long as it can be shown that the concessionaire is doing a satisfactory job. Who would determine "satisfactory" I don't presume to suggest.

168 There have been many cave tour routes over the years. I am recommending that a primary tour, as presently offered, be continued, but that identified expanded routes for tours be announced for spelunkers who want more than the general visitor now receives. A reading of the articles of 1891 and 1894 in the San Francisco *Examiner*, and other early date articles as examples, brings to light many underground passages and caverns not on today's tours. When people read these articles in my new book about the Oregon Caves, to be published in spring 1998, there seems reasons to expand tours into those passages.

If a short tour for wheelchair-bound visitors can be arranged, it would seem to be in the National Park Service's interest to do so.

I believe there is an urgent known issue to be looked upon with priority. This is for an interpretative center, with lectures and motion picture or video tape facilities to show various programs on the history and interpretation of the caves. There is an excellent resource already on site, the massive collection of color slides, from which such programs can be quickly started if a suitable site at the caves can be located. What about the lobby of the Chateau as an example, to get an interpretative program started?

Due to the large increase in numbers of recreational vehicles, it holds that persons operating such vehicles are being turned away from visiting the caves due to no parking facilities at the caves for such, and limited RV parking space at Illinois Valley Interpretative Center, and no compensating scheduled shuttle service from Cave Junction to the caves.

I am pleased to have the opportunity to offer this report.

Sincerely,

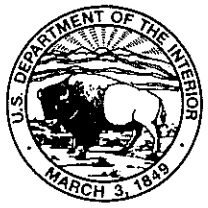
Bert Webber

Bert Webber
Research Photojournalist

RESPONSES

Letter 69: Bert Webber

1. Thank you for your correction. The change has been made.



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and worked to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS-D-28A November 1998