

NATIONAL
SPELEOLOGICAL
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DEDICATED TO THE EXPLORATION, STUDY, AND CONSERVATION OF CAVES

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July 29, 2010

Rick D. Cables, Regional Forester
Rocky Mountain Region
USDA Forest Service
740 Simms Street
Golden, CO 80401-4720

Dear Mr. Cables,

On behalf of the more than 11,000 members of the National Speleological Society, I want to register the strongest objection possible to your just-effectuated emergency closure order to all caves and mines in USFS Region 2, covering Colorado, Kansas, Nebraska, South Dakota, and Wyoming.

We feel this move is a gross over-reaction to the current situation regarding White Nose Syndrome (WNS) in bats, when not a single case has been documented anywhere within the region. Yes, the Missouri bats and lone Oklahoma bat were confirmed with having the fungus, but no other clinical signs, therefore not determined to have White Nose Syndrome, an important distinction not fully understood yet.

Seriously, from our perspective, this reaction seems very out of proportion. It's analogous to banning all visitations and boating in Region 2 waters to prevent an infestation of the invasive zebra mussel, or to banning all hikers from Region 2 to ensure they are not potentially transmitting spores of purple loosestrife, an invasive species killing off native plants in the East. On a scientific basis, blanket closure orders will do nothing to prevent the spread of WNS from bat to bat, the acknowledged primary method of transmission, if the [infected] bats are inclined to migrate out West.

This closure order has serious potential unintended consequences, which were pointed out by our members in our local chapters, members of local cave conservancies, and direct discussions with our own NSS White Nose Syndrome Liaison. It appears the various communications between the NSS and USFS in advance of issuing the order were completely ignored, and you have now alienated probably your most effective local conservation allies – those who know the caves best and possibly more so than agency staff.

The order is likely unenforceable on a practical level, given the sheer expanse of territory involved. Let me be clear, our members will honor the closure, but some members of the public likely will not – not because they are inclined to ignore orders, but because they won't know about them – which has been our experience with closure orders elsewhere in the country. We have also experienced vandalism at closed caves because the presence of conservation-minded cavers has been taken away. The numbers of people in the general public who casually visit caves far outnumber organized cavers.

We are also deeply concerned that this closure order is at odds with the directive by Agriculture Secretary, Thomas Vilsack, to update and enhance the Memorandum of Understanding between the USFS and the NSS. It seems clear that within the USFS, the people in the Wildlife and Threatened and Endangered units are dominating any balance that might be brought by the Cave and Karst units, and that the stated goal by the Secretary was not in mind as this order was developed.

As we in the speleological community know, conservation is not just about bats, but the entire cave resource. This closure order flies in the face of good science and management, criminalizes a legitimate activity by the American public, and alienates the very organization that has been the strongest ally over time in identifying, exploring, and studying the cave resources under your jurisdiction.

We truly hope you revoke this ill-considered order and work with us to fashion a more reasoned and targeted response. We are deeply concerned that the precedent set here will spread throughout the West, and we do not want the unintended consequences to compound. There are numerous, more nuanced models from around the country that have garnered support of the various stakeholders. We shared several of these with USFS personnel during our communications (like closure plans for GA, VA, and KY), but they were completely ignored.

This coming week, our national convention is being held in Vermont. We will be discussing White Nose Syndrome in many forums, as we share the deep concern for the bats. We will be meeting with one of the USFS officials working on the Memorandum of Understanding during this convention, and hope that the meeting will be constructive, but it has not been made any easier by the issuance of the emergency order. We would urge you to take a look at the Convention website (www.nss2010.com) and click on the White Nose Syndrome information link to see the extent to which we have made preparations that support both caving and the protection of bats. They are not mutually exclusive.

Next year, our convention is being held July 18-22, 2011 in Glenwood Springs, Colorado. This emergency order threatens to drive cavers away from the area, and we have already seen the reaction since the order was issued. I'm sure the Glenwood Springs area was looking forward to having upwards of 1000 people come and spend their money for a week, but that is now in jeopardy, and unnecessarily so.

Again, we hope you will reconsider your action, and we again offer our expertise in the realm of caves and karst to help continue to manage the entire cave resources, including the bats, to help you ensure those future generations have them to see, visit, and enjoy. We look forward to your response.

Sincerely,

Gordon L. Birkhimer
President

cc. Thomas I. Vilsack, Secretary
U.S. Department of Agriculture
Office of the Secretary
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Washington, D.C. 20250