

# Oregon Caves National Monument and Preserve Preserve Management Plan Finding of No Significant Impact February 2019

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to adopt the preferred alternative (Alternative B: NPS Preferred Alternative) in the Preserve Management Plan Environmental Assessment (EA) for Oregon Caves National Monument and Preserve. This alternative was evaluated against Alternative A: Continue Current Management. Both alternatives were described and analyzed in the EA. The NPS has determined that no significant impacts on the quality of the human environment will occur from implementation of the Preserve Management Plan.

## Purpose and Need

### Purpose of the Plan

The approved Preserve Management Plan will guide long-term management of the Preserve. The plan will provide a framework for managers to use when making decisions about how to best protect the Preserve's resources, how to provide quality visitor uses and experiences, how to manage visitor use, and what kinds of facilities, if any, to develop in the Preserve. The Preserve Management Plan will also provide park management, park stakeholders, and the general public with a logical and trackable process from which various management prescriptions are formed and implemented. It will ensure that management direction is developed in consultation with interested stakeholders and adopted by the NPS leadership after an analysis of the benefits, impacts, and economic costs of alternative courses of action.

### Need for the Plan

The addition of the 4,070-acre National Preserve, signed into law on December 19, 2014 by Congress, included the surrounding watershed and forest previously managed by the U.S. Forest Service (USFS). The transfer added new visitor opportunities and cultural and natural resources to the park unit, including natural waterfalls, mountain and subalpine meadows, glacial features, alpine rock gardens, dozens of vegetation communities, and vistas of Mount Shasta. The new Preserve surrounds the existing Monument and includes a variety of facilities including a campground, roads, water lines, and trails. There are also new management responsibilities, including management of hunting.

The Preserve's gateway communities view the designation of the area as an opportunity to provide expanded recreational opportunities and interpretive programs for visitors. For example, new opportunities could include guided hiking and camping, education programs at the Bigelow Lakes Botanical Area, photography workshops, etc.

## Selected Action

The selected action is Alternative B. Alternative B has more emphasis on managing and promoting visitor understanding and recreational use in the Preserve. Most visitor services will continue at their

current levels, but some changes will be made, particularly in interpretation, education, and visitor use opportunities.

Some minor changes were made to the selected action based on public review of the EA. These include not requiring a permit for equestrian use, including the potential for front country overnight use by equestrians, and determining, based on use and impacts, whether to construct a hardened trail at Bigelow Lakes.

Common to All Actions Described in the EA

The selected action includes NPS actions common to alternatives (CTA) A and B as described in the EA. The following CTA management guidance, desired conditions, and actions apply to the selected action.

Natural and Cultural Resources
<ul style="list-style-type: none"><li>• Strive to prevent adverse ecological impacts to sensitive species and ecosystems as a whole, using appropriate tools such as restoration and mitigation.</li><li>• Strive to maintain a high level of biodiversity and associated processes, such as resilience, on the Preserve.</li><li>• Complete a separate fire management plan. The plan would consider the full range of strategies for fire management, including fire suppression by a variety of means. Any methods used to suppress wildland fires would minimize adverse impacts of the suppression action and the fire, commensurate with effective control and resource values to be protected.</li><li>• Work collaboratively among all stakeholders to make progress towards maintaining biodiversity, ecological resiliency to fire-related disturbances, and safe, effective, efficient risk-based response to wildfires.</li><li>• Limit and minimize the spread of nonnatives, especially invasives in native ecosystems, to avoid adverse ecological impacts.</li><li>• Continue to support and encourage scientific research and study consistent with NPS policies and use the best available science in decision-making.</li><li>• Complete a natural resource condition assessment of the Preserve.</li><li>• Complete a climate change assessment of subalpine areas in the Preserve.</li><li>• Monitor and mitigate, where possible, the pressures of climate change and other stressors on native vegetation and wildlife. Develop adaptation strategies to address climate change.</li><li>• Enhance restoration of riparian areas and wetland habitats to the greatest extent possible.</li><li>• Inventory and evaluate facilities that could discharge into water sources, mitigate threats to water resources and hydrologic processes, and remove or upgrade facilities that do not meet water quality standards. Emphasis will be on those streams already designated or eligible to be part of the Wild and Scenic River System</li><li>• Continue to work to maintain high quality viewsheds including vista points diminished by fire suppression.</li><li>• Increase interagency coordination for cultural resource preservation strategies and treatment.</li><li>• Continue to work to improve communication and collaboration with interested tribes.</li><li>• Actively pursue special studies to determine National Register eligibility of cultural resources, such as trails, roads, campground, campsites, and sites important to the history of ecology and climate change. Manage designated and eligible/suitable wild and scenic rivers to protect and enhance their water quality, free flow condition, and outstandingly remarkable values.</li><li>• Continue to manage the Preserve to prevent the spread of Port Orford cedar disease, including through implementation of the Port Orford Cedar Disease and Management Protocol.</li></ul>
Sustainability

- Continue to reduce carbon emissions and increase energy and fuel efficiency whenever and wherever possible.
- Continue to implement the actions identified in the Oregon Caves National Monument Climate Friendly Action Plan.
- Emphasize and prioritize sustainable or green facility design for any new construction, retrofitting, and upgrading of facilities to the greatest extent possible.
- Integrate the principles, goals, and objectives of the NPS Climate Change Response Strategy into management and operations.

Visitor Experience

- Continue to provide a range of traditional visitor experiences, including hiking, hunting, camping, picnicking, wildlife viewing, bicycling, and equestrian use in appropriate areas.
- All areas would be open to hiking, except for the administrative area. Temporary safety zones would be established in certain cases, such as during heavy smoke, tree felling, trail rehabilitation, or extreme winds, or for resource protection measures, such as Port Orford cedar disease control.
- No vehicle dispersed camping or camping in the telecommunications and administrative sites would be allowed.
- Off-road vehicle use would continue to be prohibited.
- Leashed pets would be permitted in Cave Creek Campground on campsites and paved surfaces. Leashed pets would also be permitted on public and administrative roads, unless otherwise posted.
- Snowmobiles would continue to be prohibited within the Preserve.
- All areas would be open to skiing and snowshoeing, except at the telecommunications and administrative areas. Except for administrative emergency search and rescue operations, snowmobiling would continue to be prohibited. Unpaved roads on the Preserve would not be plowed.
- The NPS would continue to work on an interagency basis to ensure impacts from ongoing winter use are minimized and mitigated and that such use conforms to the respective agency regulations and policies.
- Hunting would continue to be allowed in the Preserve under state regulations.
- Improve public education and signage related to boundary awareness, hunting, and visitor safety to reduce conflicts.

Facilities and Operations

- The NPS would collaborate with the USFS on road improvements and maintenance needs to ensure visitor and shared administrative access on roads.
- Roads would continue to provide safe visitor access and emphasize opportunities for protecting and viewing scenery and wildlife and promoting high quality visitor experiences.
- The NPS would analyze administrative radio coverage throughout the Preserve and investigate methods to provide adequate and cost-effective staff communication infrastructure throughout the Preserve, especially in Cave Creek Campground.
- All special events and commercial services would continue to be subject to commercial use authorizations or special use permits.

Partnerships and Collaboration

- The NPS would pursue using Service First authority to formalize and expand the partnership with the Rogue-Siskiyou National Forest to institutionalize strong interagency collaboration and coordination in cross-boundary natural resource, fire, roads, visitor protection, search and rescue, and recreational management.

- Due to a shared interest in public and administrative access, the NPS would formalize a road maintenance agreement with the Rogue-Siskiyou National Forest for the sections of Cave Creek Road (4614000) and Buck Creek Road (4613000) that lie within the Preserve.
- The NPS would continue to work with other entities to manage nonnative species.
- The Preserve would continue to rely on other NPS parks and programs for fire management expertise.
- The Preserve would pursue written agreements and joint training with the county for search and rescue, emergency medical services, law enforcement, and dispatch services.
- The Preserve would continue to engage with the Oregon Department of Fish and Wildlife and hunter organizations to share information, resource concerns, and stewardship.
- The Preserve would continue to partner with Siskiyou Field Institute and Klamath-Siskiyou Wildlands Center on projects and educational opportunities on and about the Preserve.
- The Preserve would continue to work with the Friends of the Oregon Caves and Chateau to pursue alternative funding for Preserve projects and assistance with natural history activities.

#### Commercial Services

- No concessions operations would be added within the newly added Preserve lands.
- Commercial services within the monument would remain the same as current conditions.
- The NPS would continue to allow commercial groups with appropriate uses to access the Preserve under commercial use authorization permits. Appropriate special events and commercial services could include guided hiking, biking, horseback riding, skiing, snowshoeing, educational programs, filming, photography, wildlife observations, organized runs and walks, shuttle services, and catered picnicking.

#### Actions Unique to the Selected Action

In addition to the actions identified in CTA, the selected action will include a variety of changes to expand opportunities for visitor use, while continuing to protect park resources.

#### Description of the Selected Action Management Concept

The NPS identified the selected action as the preferred alternative for management of the National Preserve. Because of economic feasibility and the desire to maintain time-honored traditional experiences on the Preserve lands, the selected action has much in common with the Continue Current Management alternative, with some exceptions. The selected action proposes some improvements to existing facilities, additional camping opportunities and guidance, expanded outreach and partnership opportunities, some area-specific hunting guidance for public safety reasons, and additional resource protection measures to mitigate adverse effects from increased visitor use.

#### Site Specific Management

##### *Cave Creek Campground*

The Preserve will maintain the overnight campground in its current configuration, with minimal improvements over time, to provide a traditional tent and intimate camping experience. The current footprint, alignments, number of sites, aesthetics, and host site will be retained. The NPS will continue to protect sensitive resources through a variety of management actions, including temporary and seasonal closures of the trail and campsites. The campground will continue to be open on a seasonal basis and could be closed for special events. Fees will continue to be charged for camping.

The NPS would institute a reservation system for campsites, if feasible. Accessibility will be enhanced, with improvements to pathways, parking, and individual campsites. The NPS will strive to maintain the aesthetic qualities and secluded atmosphere unique to Cave Creek Campground, with no additional expansion or modifications that will degrade such qualities.

Subject to evaluation of the campground for historical significance, the NPS will explore alternatives for the best use of the attached day use area. Group camping, amphitheater, and/or space for partner-based educational programming are potential uses to be explored. Finally, the NPS will explore the use of yurts and tent platforms at a few existing sites, as long as such actions do not adversely affect eligibility for nomination to the National Register of Historic Places.

#### *Administrative Area*

The Preserve will maintain the existing headquarters, maintenance, and housing in their current locations. These facilities will continue to serve both Monument and Preserve functions. In addition, the old trailer court will be rehabilitated to accommodate a small number of staff camping trailers. Utility systems (200 feet of electrical, sewer, and water), trailer pads, fire rings, picnic tables, and bear boxes will be included in the original footprint. An overnight and year-round staff presence will be maintained here. Camping and hiking will continue to be disallowed in this area. In addition, hunting will be prohibited in the administrative area for safety reasons.

#### *Bigelow Lakes Trailhead and Basin*

Signage and trails will be improved to provide better navigation, information, and resource protection. The Bigelow Lakes Trailhead on Bigelow Lakes Road (4611070) will be widened to increase space for parking and to keep the turnaround clear. The existing vehicle barriers will be maintained, as needed. An automated system to record vehicular traffic will be installed on the last segment of the road to Bigelow Lakes to determine visitation patterns that could have management implications, such as considering the need to install boardwalks to protect sensitive sites if increased visitation adversely affects the area.

The Limestone Trail will be maintained, with appropriate screening at the Elijah Trail intersection to protect resources. At Bigelow Lakes, a hardened trail and/or boardwalk, along with interpretive signage, could be installed to protect resources to block and/or reduce the number of user-created trails. The trail to Lake Mountain will be reestablished. Efforts to engage partners in the maintenance of trails will be increased.

#### *Cave Creek Trail*

Cave Creek Trail will continue to be managed to protect Port Orford cedar from the spread of disease, including through resource protection measures such as cedar chips, drainage improvements, interpretive signs, temporary closures when wet, and continuing closure to stock use.

#### *Preserve Road System*

This Preserve Management Plan incorporates by reference the analysis of the Sucker Creek Legacy Roads and Trails Environmental Assessment (USFS 2014). Decommissioned roads will be closed to vehicle traffic. Decommissioned roads will be managed to restore the integrity of associated hillslopes, channels, and reduce erosion. The primary goal will be to restore natural drainage patterns

and infiltration capacity. Restorative actions could range from unmaintained closure to road removal, excavation of stream crossing fill material, restoration of channels to their original configuration, and placing excavated fill in stable locations to best mimic pre-disturbance topography and drainage patterns. Restorative actions will be based on site-specific evaluations and recommendations of resource specialists. In particular, evaluation of roads for eligibility as historic properties under the NHPA will occur before any project proposing a change from current conditions.

Roads maintained for vehicle access will be managed to reduce the risk of sediment delivery to stream channels during storm events (stormproofing). Roads placed in storage will be closed and unmaintained.

The NPS will explore designation of no more than five primitive drive-in campsites on Buck Road (4613031), including sites designed for accessibility. These sites will be available through the camping permit system to hunters and others during the times when the Preserve road system is open.

Tankia Road (4613066 & 4613057) will be maintained as an administrative road. As such, it will be closed to public vehicle traffic, but open to cyclists, equestrian use, and hikers. It can be used to complete a loop with Buck Peak Road (4613000). Directional and interpretive signage will be provided. In addition, the feasibility of a potential trail connection between Tankia Road and Buck Road (4613031) will be explored.

A portion (approximately 0.10 miles) of Ark Road (4611964) will be upgraded for administrative use and to preserve its eligibility for nomination to the National Register by maintaining the original footprint.

#### Program Management Guidance

##### *Natural Resources*

Natural resources will continue to be protected to a high degree (See *Common to All Alternatives* section). The NPS will continue to strive to prevent or reduce adverse ecological and evolutionary impacts to ecosystems as a whole, using appropriate tools such as restoration and mitigation. Inventorying and monitoring of ecological processes and human effects on those processes will be increased. The NPS will encourage increased ecological and evolutionary studies. The Preserve will increase its efforts to minimize the spread of nonnatives, especially invasive plants in native ecosystems. A resource stewardship strategy will be prepared to prioritize and guide resource management objectives throughout the Preserve. Old growth habitat will be protected, using a variety of tools such as fuel reduction.

A separate fire management plan will be developed in collaboration with all stakeholders to maintain biodiversity, increase ecological resiliency to fire-related disturbances, and plan safe, effective, efficient risk-based responses to wildfires.

A natural resource condition assessment will be prepared for the Monument and Preserve. Preserve wetlands will be resurveyed to assess current conditions and compare past conditions. The NPS will increase surveys and inventories for early detection of invasive species to effectively manage them before they reduce native biodiversity.

### *Cultural Resources*

The protection of cultural resources will continue. Documentation of cultural resources will also continue as funding allows. Currently, little information exists for potential archeological, historic, and ethnographic resources. The NPS will continue to depend on NPS regional and other park cultural resource and museum staff to assist with cultural resource management and compliance. The current level of cultural resources education, interpretation, and research will continue. Interpretation of cultural resources will likely remain limited because cultural resources staff will not be available to support the programming.

### *Ecological Sustainability*

The Preserve will continue to participate in NPS, interagency, and regional efforts to understand the effects of climate change on resources, assets, and visitor opportunities and develop adaptation strategies for the NPS to address anticipated changes to resources and infrastructure. The NPS will also continue to implement the goals of the current Climate Action Plan to help improve energy efficiency and reduce carbon emissions. A climate change assessment of subalpine areas in the Preserve will be conducted. Based on the results of the assessment, the NPS would mitigate the effects on both surface and subsurface hydrology and adapt with changing hydrological conditions to preserve habitat diversity, especially wetlands.

### *Soundscapes and Visual Resources*

The Preserve will continue to work to maintain high quality viewsheds, maintain natural darkness, and minimize or prevent sounds that adversely affect the Preserve's resources or visitor enjoyment. The Preserve will develop and implement a soundscape management policy that includes an emphasis on preserving natural soundscapes. Viewshed management guidelines will be prepared, relying in part on historic images of viewsheds.

### *Visitor Experience*

Visitors will continue to enjoy the current range of recreational experiences available within the Preserve. Traditional recreation such as hunting, backcountry camping, day-hiking, backpacking, private stock use, and sightseeing will also continue to be available.

### *Biking*

A new loop for bicycling will be made available on Tankia Road (4613066 & 4613057). Biking will be permitted on paved and unpaved park and administrative roads unless posted.

### *Camping*

A permit system will be instituted for backcountry camping. Permits will identify sensitive areas closed to camping, as needed. The NPS will explore designating a few vehicle campsites on Buck Road (4613031), including sites designed for accessibility.

### *Hunting*

Hunting will continue to be allowed under state regulations. The NPS will pursue safety zones for areas surrounding the Cave Creek Campground, the Big Tree Trail, the administrative area, and No Name Trail. These areas receive relatively high concentrations of visitors. Many of these trails

originate from the monument, where hunting is not permitted, and briefly enter the Preserve for a short distance. The NPS will increase education for both visitors and hunters related to safety on the Preserve during hunting season(s).

#### *Horses and Pack Animals*

Private stock use will be allowed on trails and other designated routes. No grazing will be permitted, weed free feed will be required and proper waste management guidelines will be established. Backcountry overnight stock use will not be permitted. The NPS will consider allowing overnight equestrian use at the primitive campsites on Buck Road if space can be found that accommodates trailers without extensive earth moving or tree removal; this will be determined in the future, once more detailed plans for the primitive campsites are developed. No additional facilities will be constructed on Preserve lands to accommodate trailers.

#### Interpretation, Education, and Information

While the focus will be on electronic media and outreach, some formal education programs could be provided at Cave Creek Campground. Nature walks will occur on the Big Tree Trail, as feasible. Road access challenges make formal ranger-led educational programs impractical in much of the Preserve. Educational programming will focus on classroom services (where rangers provide programs at schools), curriculum development, and electronic lesson plans in order to reach more diverse audiences. Ranger-led educational field trip programs in the monument will continue to use themes shared with the Preserve. Expanded opportunities for partner-provided education on the Preserve will be explored and promoted.

Limited personal interpretive services and interpretive waysides will be provided on Preserve lands. Outreach, using community venues and the monument, for interpretive programs will be increased. Outreach, print, and electronic media will be emphasized.

The NPS will provide improved directional signage throughout the Preserve and update electronic and print maps, focusing on trail intersections and boundaries. Primary locations to learn about conditions, opportunities and resources on the Preserve will be at existing visitor centers and on electronic media.

#### Transportation and Facilities

##### *Level and Character of Development*

No new facilities will be constructed in the Preserve, aside from replacement facilities due to damage or loss, or small, sensitively designed improvements such as those described above under *Preserve Road System* and *Camping*.

##### *Transportation and Access*

See *Common to All Alternatives* for descriptions of the ongoing and continuing efforts to collaborate with the USFS on road maintenance where the objectives of both agencies are served.

##### *Outreach and Partnership Programs*

The Preserve will continue to partner, when possible, with tribes, organizations, and local communities to improve resource management and visitor experiences. The NPS will pursue using Service First

authority to formalize and expand the partnership with the Rogue–Siskiyou National Forest to institutionalize strong interagency collaboration and coordination in cross–boundary management, including roads, natural resources, fire, visitor protection, search and rescue, and recreation. The Preserve will continue to place a high priority on facilitating excellent working partnerships with other NPS units in the region’s Klamath Network to accomplish its management objectives. See *Common to All Alternatives* for additional partnership priorities.

In addition, under the selected action, the Preserve will:

- Review and potentially expand the structural fire responsibility with Illinois Fire District related to the headquarters and the campground.
- Foster relationships with Oregon universities on mutually beneficial resource and interpretive opportunities.
- Expand relationships with Southern Oregon Visitors Association, Travel Oregon, Grants Pass Active Club, and local chambers of commerce to highlight recreational opportunities in the Preserve.
- Maintain and expand relationship with the Oregon Caves Natural History Association (NHA) to support Preserve projects. Explore facilitation of a more autonomous Oregon Caves NHA from the Crater Lake NHA.
- Pursue expanded relationships with local youth organizations in order to introduce youth to resources and opportunities on the Preserve.
- The NPS will continue to partner with Siskiyou Field Institute and Klamath–Siskiyou Wildlands Center on projects and educational opportunities on and about the Preserve. The selected action will expand this partnership to include the Preserve as well as the monument.

#### Estimated Costs

Implementation of the approved plan will depend on future funding. The approval of this plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. Funding will be spread over time, with each project prioritized according to funding opportunities and other factors at any given time. Full implementation of the actions in the approved plan will likely take many years. The costs identified here will likely increase for projects completed in the future.

#### *One-time Improvement Costs*

One–time costs for the selected action include projects that are currently approved and have been funded, projects that are considered “common to all alternatives,” and proposed projects identified in the preferred alternative.

#### *Operational Costs*

Oregon Caves National Monument currently has an operating budget of \$1,668,000. This base budget would remain the same under both Alternatives A and B. Total annual operation costs for Preserve operations will be \$315,000 for full implementation of this alternative. This includes the Preserve’s existing annual operating budget of \$190,000, plus \$125,000 for additional NPS staff. Funding allocations within the existing \$190,000 base budget will be slightly altered from existing conditions, to include additional funds for trail and road maintenance. Additional operational costs will include campground operations costs (approximately \$20,000 annually).

The Monument also uses base funding to provide for an ongoing boundary survey. The boundary study will ultimately have a total cost of approximately \$150,000 and is anticipated to be complete in 2022. To date, approximately \$55,000 has been dedicated to this effort.

The estimated costs for the selected action will also include two new full-time (subject to furlough) staff positions: one motor vehicle operator and one biological science technician. These two positions would address the increased needs for road maintenance and natural resource monitoring related to the expanded Preserve area. Additional interpretive, maintenance, and resource monitoring needs would be met as feasible through seasonal or short-term positions, or through partnerships.

## Rationale for the Decision of the Selected Action

The selected action best protects the Preserve's resources while providing quality visitor experiences. This alternative maintains time-honored traditional experiences on Preserve lands within the bounds of NPS policy, and maintains an environment that supports a diversity and variety of individual choices. These experiences will be enhanced by improvements to existing facilities, additional camping opportunities, and resource protection measures to mitigate adverse effects from increased visitor use. Natural and cultural resources will continue to be protected to a high degree. This alternative will also provide the greatest educational and partnership opportunities to foster better understanding of the Preserve's resources.

## Other Alternatives Considered

### ALTERNATIVE A: CONTINUE CURRENT MANAGEMENT

Alternative A is the "no action" alternative and assumes that existing management, programming, facilities, staffing, and funding would generally continue at their current levels. A no action alternative is required by the National Environmental Policy Act and serves as a baseline for comparison in evaluating the changes and impacts of other alternatives. The emphasis of alternative A would be to protect the values of the Preserve without any increases in staff, programs, funding support, or facilities. Resource preservation and protection would continue to be a high priority for the management of the Preserve. Staff would continue to work on Preserve-related projects as funding allows. Management of visitor use and facilities would generally continue under existing levels and types of services and regulations. No new facilities would be constructed. Existing visitor facilities, such as buildings, structures, roads, parking areas, camping areas, and trails, would be maintained to the extent possible.

#### Site Specific Management

##### *Cave Creek Campground*

The Preserve would maintain its overnight campground in its current configuration, with minimal improvements over time. The campground would continue to provide drive-up camping opportunities for tent campers and campers with small recreational vehicles.

##### *Administrative Area*

Under alternative A, the Preserve would maintain the existing headquarters, maintenance, and housing in its current location. These facilities would continue to serve both Monument and Preserve

functions. An overnight and year-round staff presence would be maintained here. Public use of the area would continue to be disallowed in this area.

*Bigelow Lakes Trailhead and Basin*

Signage and trails would remain relatively unchanged, with minimal maintenance. Basic signage and vehicle barriers exist at the trailhead. The Limestone and Lake Mountain trails are poorly maintained and difficult to follow at points.

*Cave Creek Trail*

Cave Creek Trail would continue to be managed to protect Port Orford cedar from the spread of disease, including through resource protection measures such as cedar chips, drainage improvements, and temporary closures when wet.

*Preserve Road System*

This Preserve Management Plan incorporates by reference the analysis of the Sucker Creek Legacy Roads and Trails Environmental Assessment (USFS, 2014) and uses the decisions made in that document as the basis for alternative A. The table below lists the Preserve roads and their disposition under the environmental assessment. Roads listed as decommissioned would be closed to vehicle traffic. Decommissioned roads would be managed to restore the integrity of associated hillslopes, channels, and reduce erosion. The primary goal would be to restore natural drainage patterns and infiltration capacity. Restorative actions could range from unmaintained closure to road removal, excavation of stream crossing fill material, restoration of channels to their original configuration, and placing excavated fill in stable locations to best mimic pre-disturbance topography and drainage patterns. Restorative actions would be based on site-specific evaluations and recommendations of resource specialists. In particular, evaluation of roads for eligibility as historic properties under the National Historic Preservation Act would occur before any project proposing a change from current condition.

Roads maintained for vehicle access will be managed to reduce the risk of sediment delivery to stream channels during storm events (stormproofing). Roads placed in storage would be closed and unmaintained.

**Preserve Road Treatments**

Road No.	Name	Miles	Treatment	Use
4600150	Cave Creek Campground	1.2	Stormproof	Public
4600180	Heirloom	0.68	Stormproof	Administrative
4611070	Bigelow Lakes	1.39	Stormproof	Public
4611960	Lake Creek	2.87	Stormproof	Public
4613000	Buck Peak	1.42	Stormproof	Public
4613031	Buck	1.38	Stormproof	Public
4613067	Buck Peak LO	0.62	Stormproof	Public
4614000	Cave Creek	1.44	Stormproof	Public
4611962	Arrow	0.2	Decommission	Closed to vehicle access
4611965	Black Pepper	0.5	Decommission	Closed to vehicle access
4611969	Arena	0.7	Decommission	Closed to vehicle access
4613057		0.22	Decommission	Closed to vehicle access
4613066	Tankia	1.34	Decommission	Closed to vehicle access

4613406	Dickiwich	0.38	Decommission	Closed to vehicle access
4614040		0.28	Decommission	Closed to vehicle access
4611964	Ark	0.4	Storage	Closed to vehicle access
4613059	Buck Snort	0.31	Storage	Closed to vehicle access
4614024		1.02	Storage	Closed to vehicle access

Program Management Guidance

*Natural Resources*

Natural resources would continue to be protected to a high degree (See *Common to All Alternatives* for more details on natural resource management). The NPS would continue to strive to prevent adverse ecological and evolutionary impacts to ecosystems as a whole, using appropriate tools such as restoration and mitigation. A minimal amount of inventorying and monitoring of ecological processes would continue to occur, as funding allows. Minimal ecological and evolutionary studies would occur. The Preserve would continue to limit and minimize the spread of nonnatives, especially invasives in native ecosystems, but would be hampered by a lack of inventorying, monitoring, and planning.

Through the development of a separate fire management plan, the NPS would strive to create fire-adapted communities where human populations and infrastructure can withstand a wildfire without loss of life and property. The full range of strategies for fire management would be considered, including suppression by a variety of means. Any methods used to suppress wildland fires would be designed to minimize adverse impacts of the suppression action and the fire, commensurate with effective control and resource values to be protected. In the development of the plan, the NPS would work collaboratively among all stakeholders to make progress towards maintaining biodiversity, ecological resiliency to fire-related disturbances, and safe, effective, efficient risk-based response to wildfires.

A natural resource condition assessment would be prepared for the Preserve and monument. In addition, the Preserve would continue to lack sufficient survey and inventory information on wetlands.

*Cultural Resources*

The protection of cultural resources would continue. Documentation of cultural resources would also continue as funding allows. At the present, little information exists for potential archeological, historic, and ethnographic resources. The NPS would continue to depend on others within the National Park Service to assist with cultural resource management and compliance. The current level of cultural resources education, interpretation, and research would continue. Interpretation of cultural resources would likely remain limited because cultural resources staff would not be available to support the programming.

*Ecological Sustainability*

The Preserve would continue to participate in NPS, interagency and regional efforts to understand the effects of climate change on resources, assets, and visitor opportunities and develop adaptation strategies for the NPS to address anticipated changes to resources and infrastructure. The NPS would also continue to implement the goals of a current Climate Action Plan to help improve energy

efficiency and reduce carbon emissions. A climate change assessment of subalpine areas in the Preserve would be conducted.

#### *Soundscapes and Visual Resources*

The Preserve would continue to maintain high quality viewsheds through consultation with adjacent agencies and would sensitively design and site new facilities or infrastructure in order to limit impacts on scenic views and preserve natural darkness by minimizing light pollution. Sounds that adversely affect the preserve's resources and values would continue to be minimized.

#### *Visitor Experience*

Visitors would continue to enjoy the current range of recreational experiences available within the Preserve. Traditional recreation such as hunting, backcountry camping, day-hiking, backpacking, private stock use, and sightseeing will continue to be available to the same degree that they are currently. Stock use is defined as equestrian (horse and mule) trail access. In this document, the terms "equestrian use" and "stock use" are used interchangeably. See *Common to All Alternatives* for actions that will be taken in both Alternative A and B.

#### Biking

Bicycles would continue to be permitted on park roads that are otherwise open for motor vehicle use by the general public.

#### Camping

Camping would be allowed only in designated sites or areas.

#### Hunting

Hunting would continue to be allowed in the Preserve under state regulations.

#### Horses and Pack Animals

Horses and pack animals would be allowed on designated trails in the Preserve pursuant to the regulations in 36 CFR 2.16.

#### Interpretation, Education, and Information

Interpretation, education, and information would continue to be limited. A minimal amount of education programming and community outreach would continue to occur. The park's website would continue to be a primary source of information on preserve resources and opportunities, with very limited personal services in the preserve itself.

#### Transportation and Facilities

##### *Level and Character of Development*

No new facilities would be constructed in the preserve, aside from replacement facilities due to damage or loss, or small, sensitively designed improvements.

##### *Transportation and Access*

See *Common to All Alternatives* for descriptions of the ongoing and continuing efforts to invest in maintenance and collaborate with the USFS on current roads.

### *Outreach and Partnership Programs*

The preserve would continue to partner, when possible, with tribes, organizations, and local communities to improve resource management and visitor experiences. The NPS would pursue using Service First authority to formalize and expand the partnership with the Rogue–Siskiyou National Forest to institutionalize strong interagency collaboration and coordination in cross–boundary management, including roads, natural resources, fire, visitor protection, search and rescue, and recreation. The preserve would continue to place a high priority on facilitating excellent working partnerships with other NPS units in the region’s Klamath Network to accomplish its management objectives. See *Common to All Alternatives* for additional partnership priorities.

## Summary of Preliminary Options Considered and Dismissed

Several other preliminary options were considered for the project, but were ultimately dismissed from further analysis.

### Natural Selection Alternative

During the public scoping process, several commenters suggested that the planning team look at an alternative developed for the Medford District Bureau of Land Management South Deer Landscape Management Project (2005) called the Natural Selection Alternative. The alternative is based on a perspective “that natural communities of species should be preserved as they are ... and that the total natural ecosystem must remain intact, with human activities in harmony with nature.” The planning team considered this alternative and determined that much of the proposed alternative did not apply to the current planning effort since most of it dealt with extractive uses which are not planned in the Preserve and are already controlled by law and policy. The portions of the proposed alternative that dealt more with restoration of natural areas, biodiversity, habitat connectivity, and science–based management were recognized as important objectives already woven into National Park Service management and both the no–action and preferred alternative. Because many of the ideas presented in the Natural Selection Alternative are found in the proposed Preserve Management Plan, as well as existing law and policy, the planning team dismissed it from further consideration as a stand–alone alternative.

### Major Expansion of the Road or Trail System

Major expansion of either the road or trail systems was considered by the planning team and dismissed for economic infeasibility and the potential for adverse resource impacts. The team determined that existing road and trail networks were adequate for superlative visitor experiences and access, while still protecting resources. While roads often provide important access and transportation, their presence can also influence the habitat quality, hydrology, geomorphology, and ecosystem processes of watersheds. The Sucker Creek Legacy Roads and Trails Project and Environmental Assessment (2014), prepared by the US Forest Service, provide a well–reasoned analysis for treatment of existing roads in the Preserve as described in the no–action and preferred alternatives. After analysis by the planning team, the 2014 environmental assessment was adopted and used as the basis for the Preserve Management Plan’s alternatives. In addition, expanded use of the system by opening up Preserve roads to public use in the winter was dismissed due to ongoing concerns about the spread of Port Orford cedar disease and potential erosion.

### New Visitor Service Facilities in the Preserve

The planning team considered the possibility of a new structure on Preserve lands to serve visitors. This was found to be infeasible due to cost and impractical due to location. The existing visitor facilities at the monument are adequate to provide information and visitor contact for Preserve visitors. In most cases, visitors come to the monument to visit the caves or Chateau first. Visitation to the Preserve is relatively light. Utilities such as electricity and water already exist at the monument and would be prohibitively expensive to provide elsewhere on the Preserve. The preferred alternative recommends using the existing facilities at the monument to facilitate new opportunities for visitors and Preserve-related exhibits, as well as increasing educational outreach and electronic efforts to disseminate information.

### Alternative Cave Management Strategies

Several commenters proposed alternative cave management strategies to those previously identified in the monument's subsurface management plan. The subsurface management plan places restrictions, in accordance with the Federal Cave Resources Protection Act and NPS policy, on certain activities in monument caves by visitors, such as digging. Cave resources on the Preserve are located within the same watershed and share many commonalities with the caves previously identified in the monument. Based on this and no indication in the legislation that cave resources on Preserve lands were to be treated differently from resources in the monument, the planning team concluded that the proposed alternative strategies would conflict with an up-to-date valid plan. Changes to cave management strategies could be addressed in the future in an update to the subsurface management plan.

### Boundary Expansion

The 1999 general management plan for the monument focused on expansion to protect the monument and its cave system from adverse effects from adjacent land uses. With the addition of the Preserve and its watershed-encompassing boundary, this concern for edge effects and adjacent land uses is greatly reduced. Early in the alternatives development process the planning team discussed potential boundary adjustments as is required by the National Parks and Recreation Act of 1978. It was determined that Monument and Preserve boundary resources, including scenic vistas, subsurface resources, and vegetation are adequately protected by the ridge to ridge boundary of the Preserve. It is not necessary to include additional lands to adequately protect significant resources and enhance public enjoyment. A boundary survey was initiated in 2017 under agreement with the BLM and USFS. The boundary will be surveyed by a USFS survey crew, beginning from Buck Peak, and will take multiple years to complete.

## Mitigation Measures Incorporated in the Selected Action

Resource protection measures that will be implemented to avoid or minimize potential plan-related impacts to natural and cultural resources are identified below. The superintendent and senior staff (Chiefs of Natural and Cultural Resources, Interpretation, and Maintenance) would be responsible for the implementation of these measures on projects tiering from this GMP.

Within the broad context of this management framework for the Preserve, the following measures will be used to minimize potential impacts from the implementation of the selected action. These measures will be applied subject to funding and staffing levels. Additional mitigation measures will be

identified as part of implementation planning and for individual projects to further minimize resource impacts.

## Management and Protection of Natural Resources

### *Air Quality*

- Minimize NPS vehicle use and emissions and employ the best available control technology.
- Encourage employee carpooling and strive to accommodate employee work schedules to maximize carpooling ability.
- Implement a no idling policy for all government vehicles.
- Coordinate and consolidate NPS vehicle trips to accomplish multiple tasks and carpooling, when possible.
- Implement sustainable practices in unit operations and building designs that minimize energy demands, thus minimizing air pollution emissions.

### *Natural Sounds*

- Implement standard noise abatement measures during unit operations, including: scheduling to minimize impacts in noise-sensitive areas, using the best available noise control techniques, using hydraulically or electrically powered impact tools when feasible, and locating stationary noise sources as far from sensitive habitat and concentrated visitor use areas as possible.
- Locate and design facilities to minimize above-ambient noise.
- Avoid idling motors when power tools, equipment, and vehicles are not in use.

### *Dark Night Skies (Lightscapes)*

- When outdoor lighting is needed, install energy-efficient lights equipped with timers and/or motion detectors so that light would only be provided when it is needed to move safely between locations.
- Use low-impact lighting, such as diffused light bulbs, and techniques such as downlighting to prevent light spill and to preserve the natural lightscape.

### *Hydrologic Systems and Water Quality*

- For projects requiring ground disturbance, implement erosion control measures as appropriate, including mitigating unnatural discharge into water bodies. Regularly inspect construction equipment and vehicles for leaks of petroleum and other chemicals to prevent water pollution.
- Use bio-lubricants (such as biodiesel and hydraulic fluid) in construction equipment.
- Develop and implement a spill prevention and response plan and acquire supporting equipment.
- Integrate runoff management and mitigation systems into the designs of parking areas near water resources.
- Develop sediment control and prevention plans and implement best management practices for projects that could impact water quality.
- Reduce and reuse wastewater.

### *Soils*

- Locate new facilities on soils suitable for the type and scale of development proposed.

- Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting, silt fencing, and temporary sedimentation basins in construction areas to reduce erosion, surface scouring, and discharge to water bodies.
- Require all project managers to implement the unit's invasive plant management prevention and treatment program.
- Once work is completed, revegetate construction areas with appropriate native plants in a timely period according to revegetation plans.

### *Vegetation*

- Monitor areas used by visitors for signs of native vegetation disturbance. Use public education, revegetation of disturbed areas with native plants, erosion control measures, and barriers to control potential impacts on plants from erosion, trampling, or social trails.
- Minimize size and number of staging areas, overflow parking, and operational impacts to vegetation by delineating these areas and revegetating if necessary.
- Develop revegetation plans for disturbed areas and require the use of genetically appropriate native species. Revegetation plans will specify species to be used, seed/plant source, seed/plant mixes, site-specific restoration conditions, soil preparation, erosion control, ongoing maintenance and monitoring requirements, etc. Salvaged vegetation will be used to the greatest extent possible.
- Implement an invasive plant prevention, treatment, and management plan focusing on prevention and rapid response. Standard measures could include the following elements: use only weed-seed-free materials for road and trail construction, repair, and maintenance; ensure equipment arrives on site free of mud or seed-bearing material; identify areas of invasive or nonnative plants pre-project and treat any populations or infested topsoil before construction (e.g., topsoil segregation, storage, herbicide treatment); when depositing ditch spoils along the roads, limit the movement of material to as close as possible to the excavation site; scrupulously and regularly inspect areas that serve as introduction points for invasive or nonnative plants; revegetate with genetically appropriate native species; inspect rock and gravel sources to ensure these areas are free of invasive and nonnative plant species; and monitor locations of ground-disturbing operations for at least three years following the completion of projects.

### *Wildlife*

- Employ techniques to reduce direct human impacts to wildlife, including visitor education programs, restrictions on visitor and park activities when warranted, development and use of best management practices for management activities (including construction), permit conditions, temporary and/or permanent closures of sensitive sites, and law enforcement patrols.
- Implement measures to reduce adverse effects of nonnative plants and wildlife on native species.
- Protect and preserve critical habitat features, such as rock outcrops, swales, nesting sites, roosting sites, and migration corridors, whenever possible.

### *Special Status Species*

- Mitigation actions will occur during normal park operations as well as before, during, and after projects to minimize immediate and long-term impacts on rare, threatened, and endangered species. These actions will vary by project area, and additional mitigation measures may be added depending on the action and location. Many of the measures listed for vegetation and wildlife resources will also benefit species that are rare, threatened, endangered and/or of management concern by helping to preserve or minimize impacts on habitat.
- Conduct surveys and monitoring for special status species as warranted.
- Locate and design facilities/actions/operations to avoid or minimize impacts on special status species habitat. If avoidance is infeasible, minimize and mitigate for adverse effects as appropriate and in consultation with technical experts.
- Minimize disturbance to special status species, nesting, and migratory bird habitat through spatial and temporal planning.
- Develop and implement restoration and/or monitoring plans as warranted. Plans should include methods for implementation, performance standards, monitoring criteria, and adaptive management techniques.

### Management and Protection of Cultural Resources

- Pursue strategies to protect cultural resources, including museum collections and archeological, historic, ethnographic, and archival resources, while encouraging visitors and employees to recognize and understand their value.
- Avoid adverse impacts to properties determined eligible for listing in the National Register of Historic Places. If adverse impacts cannot be avoided, mitigation will be developed in consultation with the SHPO, tribes, and other consulting parties pursuant to 36 CFR Part 800, the implementing regulations for the National Historic Preservation Act.

### *Archeological Resources*

- Known archeological sites will be periodically monitored to track their condition, identify any new or emerging threats, and identify any treatment measures necessary for their preservation and protection.
- Consultation with traditionally associated American Indian tribes and groups will help inform managers of the traditional cultural and religious significance of these resources.
- Archeological surveys will precede ground-disturbance required for new construction or other management activities. Known archeological resources will be avoided to the greatest extent possible.
- If previously unknown archeological resources are discovered during any project work, work in the immediate vicinity of the discovery will be halted until the resources could be identified, evaluated, and documented and an appropriate mitigation strategy could be developed, if necessary, in consultation with the state historic preservation office and associated American Indian tribes and groups.
- If previously unknown archeological resources are discovered as a result of natural processes, these resources will be documented, added to the unit's inventory, stabilized where feasible and appropriate, and included in the periodic monitoring program.

### *Values, Traditions, and Practices of Traditionally Associated Peoples*

- Maintain an active tribal consultation program for identification and evaluation of natural and cultural resources with cultural and religious significance to traditionally associated American Indian tribes and groups, as well as recommendations for management.
- Consult with tribes and tribal groups regarding unit undertakings with the potential to affect resources of cultural and religious significance to ensure tribal perspectives are understood, and adverse effects are avoided or minimized.

### *Historic Resources*

- Documented historic sites, structures, buildings, and landscapes will be periodically monitored to track their condition, identify any new or emerging threats, and identify any treatment measures necessary for their preservation and protection.
- Cyclic maintenance, periodic repair, and rehabilitation of historic buildings, structures, and landscapes will be undertaken in keeping with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to protect and maintain the integrity and significance of the resources.

### *Scenic Resources*

- Design, site, and construct facilities to minimize adverse effects on natural and cultural resources and visual intrusion.
- Provide vegetative screening, where appropriate.

### *Socioeconomic Environment*

- During the future planning and implementation of the approved management plan for the Preserve, National Park Service staff will pursue partnerships with tribes, local communities, and county governments to further identify potential impacts and mitigating measures that will best serve the interests and concerns of both the National Park Service and the local communities.

### *Sustainable Design*

- Sustainable practices will be used in the selection of building materials and sources and building location and siting. Design standards specific to the unit will be developed in all historic preservation and construction projects.
- Projects will use sustainable practices and resources whenever practicable by recycling, reusing, and minimizing materials, minimizing energy consumption during construction, and reducing energy needs throughout the lifespan of the project.

## Why the Selected Action (Preferred Alternative) Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR 1508.27, significance is determined by examining the following criteria. Impacts may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial. No major adverse or beneficial impacts were identified in the environmental assessment that require analysis in an environment impact statement.

The primary impact topics identified in the environmental analysis and documented in the environmental assessment including the following: hydrologic resources and processes, including wetlands and floodplains, geological resources and processes, vegetation, wildlife and wildlife habitat, including special status species, cultural resources, visitor opportunities and access, Preserve operations, and socioeconomics.

***Degree to which the proposed action affects public health or safety.*** The selected action would improve public health and safety through limitations on hunting in the vicinity of high-use areas, such as the campground and popular monument trails. Most of the Preserve would remain open to hunting and visitors to the broader Preserve would be better educated about recreational safety during hunting season. In addition, partnerships would be enhanced in areas related to public safety and stewardship, among others.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:*** As analyzed in the environmental assessment, there will be no major adverse effects on park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. Lake Creek and Upper Cave Creek have been found eligible as wild and scenic rivers, however the selected alternative actions would not affect the outstandingly remarkable values identified for these areas.

***Degree to which the effects on the quality of the human environment are likely to be highly controversial:*** No highly controversial effects were discovered during the preparation of the environmental assessment, including during the public comment period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** No highly uncertain or unique or unknown risks were discovered during the preparation of the environmental assessment, including during the public comment period.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The selected action does not establish a precedent for future actions with significant effects. As with a GMP, however, it does include guidance for future actions.

***Whether the action is related to other actions with individually insignificant, but cumulatively significant, impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts:*** The selected action is not related to other actions with individually insignificant, but cumulatively significant impacts.

***The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:*** The selected action would not affect districts, sites, highways, structures, or objects listed on or eligible for listing on the National Register of Historic Places, or which may cause loss or destruction of significant scientific, cultural,

or historical resources. Projects proposed in the selected action would be analyzed on a case-by-case basis as implementation of this programmatic GMP occurs. Future projects would require site specific analysis, including determining the area of potential effects and securing SHPO concurrence with the determination of effect on archeological and historic resources.

***The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973:*** No actions are proposed that would affect listed endangered or threatened species or critical habitat. Future project implementation would require site specific analysis of special status species impacts and additional consultation with the USFWS.

***Whether the action threatens a violation of federal, state, or local environmental protection laws:*** The selected action is compliant with all federal, state, and local environmental protection laws as demonstrated in the analysis in the environmental assessment.

## Public Involvement

Public Scoping (April 15 – June 10, 2016)

In spring of 2016, the National Park Service (NPS) began the “scoping” portion of the planning process to learn what the public believes are the most important issues facing the Oregon Caves National Preserve and present the park staff’s proposed action for management of the Preserve. The NPS announced the public scoping period and invited public comment through newsletters, correspondence, press releases, public workshops, and the NPS Planning, Environment, and Public Comment (PEPC) website: <http://parkplanning.nps.gov/preserveplan>. NPS staff produced and mailed Newsletter #1—Public Scoping to approximately 400 individuals, organizations, and agencies on the NPS mailing list. Press releases were distributed to local and regional news media. The public was invited to submit comments by mail, e-mail, fax, online, at public workshops, and during virtual meetings.

Public Workshops and Written Comments: In spring of 2016, the NPS released a summary newsletter and held two public meetings on the Preserve Management Plan and Wild and Scenic River Study. Approximately 400 newsletters were mailed or emailed to organizations and individuals on the park mailing list. A comment form was included in the newsletter so that members of the public could provide feedback to the planning team. The public comment period began April 15, 2016 and ran through June 10, 2016. Press releases asking for public comments and announcing the public meetings were distributed to local newspapers. The newsletter was also published and made available for electronic comment on Planning, Environment and Public Comment (PEPC) website. A link to the newsletter was provided on the OCNMP’s website.

In May 2016, the planning team held two public open houses in Oregon, including one in Cave Junction and one in Grant Pass. Displays and stations were set up at the start of the meetings so that attendees could have one-on-one conversations with members of the planning team. Planning team members recorded comments on flipcharts and comment forms were also made available. The OCNMP received written responses in the form of letters, emails, newsletter forms, and web comments from 19 organizations and individuals.

Comments received during scoping demonstrated that the public values the Preserve's diverse resources, viewsheds, solitude, visitor opportunities, and facilities. Issues and concerns raised during public scoping generally involved suggestions for the types and levels of services, access, and activities offered at the Preserve while ensuring a high degree of protection of the Preserve's resources. The Preserve Management Plan alternatives provide strategies for addressing these issues within the context of the purpose, significance, and special mandates in the *Foundation for Planning and Management*. A complete summary of public scoping comments was provided in the Draft Plan/Environmental Assessment.

Public Review of Environmental Assessment (April 3 – July 2, 2018)

In spring 2018, the NPS released the Draft Preserve Management Plan and Environmental Assessment, and the Draft Wild and Scenic River Study. The NPS announced the draft review period and invited public comment through emails, postcard mailings, flyers, press releases, and the NPS Planning, Environment, and Public Comment (PEPC) website:

<http://parkplanning.nps.gov/preserveplan>. Emails were sent to approximately 650 individuals, organizations, and agencies on the NPS mailing list, and postcards were mailed to another approximately 200. Electronic copies of the plan, study, and a summary newsletter were made available on the PEPC website, and hard copies were available at public meetings or by request. The public was invited to submit comments by mail, e-mail, online, and at public workshops. The 90-day public comment period began April 3, 2018 and ran through July 2, 2018.

In April 2018, the planning team held two public open houses in Oregon, including one in Cave Junction and one in Grants Pass. Displays and stations were set up at the start of the meetings so that attendees could have one-on-one conversations with members of the planning team. Planning team members recorded comments on flipcharts and optional comment forms were also made available. 19 individuals attended the two public meetings.

The NPS received 32 written responses in the form of emails and web comments. One form letter was sent by 12 volunteers associated with the Southern Oregon Trail Alliance advocating for mountain bike use on trails. Another organized letter campaign from the Sourdough chapter of the Back Country Horsemen of America sent 6 unique letters with a similar message advocating for overnight equestrian use. Comments, both through public workshops or written correspondence, were received from six organizations, affiliates, and elected officials.

#### *Public Comment Summary*

General Comments: A number of commenters expressed general support for the Preserve. Commenters also expressed their general support for protecting natural resources and public lands.

Fundamental Resources and Values: One comment letter suggested adding old growth forests and unique mountain meadow ecosystems as Fundamental Resources and Values.

Preferred Alternative: Some commenters stated that they agreed with the identification of the preferred alternative. Commenters also specified aspects of the preferred alternative that they particularly liked, such as the desire to maintain traditional experiences on Preserve lands, the potential for yurts in Cave Creek campground, improvements at the Bigelow Lake parking area,

maintenance of the Limestone Trail, bicycling and equestrian opportunities on Tankia Road, and expanding partnerships with recreational groups. A few commenters made suggestions which were already included in the preferred alternative, including partnering with nearby colleges and universities for research, providing bicycling opportunities, and allocating funding for road maintenance. One comment letter disagreed with the selection of Alternative B as the Environmentally Preferable Alternative because it does not propose decommissioning some midslope roads with high potential for sedimentation and limited administrative need (roads 4613066 and 4613057).

Natural Resources: One commenter suggested that the NPS undertake an inventory and condition report of the existing native forest and old growth areas on the Preserve. Another comment letter asked that the plan identify the need to kill encroaching small Douglas-fir trees that will soon shade out populations of California Globe Mallow (*Illiamna latibracteata*).

Fire: Commenters encouraged the NPS to address fire management. One comment letter proposed that the Preserve Management Plan should be consistent with the Rogue Valley Integrated Community Wildfire Protection Plan and the Illinois Valley Wildfire Protection Plan. Another comment letter recommended that the NPS contract with the Oregon Department of Forestry for standby fire suppression; aggressively reduce fuels within 1000' of the Chateau; station a fire engine there; and train Monument staff in initial attack for wildland or structural fire. Another comment suggested expanding and improving the Fire Management Plan for the Monument and Preserve using the Crater Lake fire plan as a model, including hazardous fuels management, and sharing resources with the Forest Service and local jurisdictions. Another comment letter suggested coordinating with the Rogue River-Siskiyou National Forest for both near term fire suppression and the development of a fire management plan. This letter also suggested the monument map all former plantations in the Preserve and treat them to reduce artificially high fire hazard and to hasten development of desirable ecological function.

Bigelow Lakes: Multiple commenters stated that a boardwalk at Bigelow Lakes was unnecessary, too expensive, and would cause too much damage. Commenters also stated that they believed people would not stay on the boardwalk. One comment letter noted that overnight campers and illegal motorized vehicles cause soil and vegetation damage in the Bigelow Lakes area, not day users, and that any sort of trail hardening, signage, or boardwalk should be eliminated from the plan. Another commenter stated that signage and minor trail improvements such as water bars and rock work would be enough to keep people on the trail. One comment letter asked for the document to clarify if equestrian use would still be allowed if this trail was hardened or a boardwalk constructed, and asked that any trail solutions in this area continue to allow equestrian use. One comment letter expressed support for boardwalks and interpretive signs to limit damage in the Bigelow Lakes area.

Commenters also suggested that overnight camping be restricted at Bigelow Lakes. One commenter suggested complete prohibition of camping in the area; another letter suggested that the plan specify no overnight camping within 100 feet of the lake and not allow campfires.

Camping: Numerous commenters requested that overnight equestrian camping be allowed in the Preserve. Commenters suggested that the primitive campsites proposed on Buck Road allow equestrian use. One comment letter stated that additional facilities would not be needed to allow

equestrian use at these campsites, because riders can tether their stock to their trailers overnight. This letter notes that overnight drive-in camping is a historic use practiced by equestrians before the area was designated as a national preserve. One commenter suggested that running water and bathroom/shower facilities be provided for campers.

Bikes: A form letter sent by 12 volunteers from the Southern Oregon Trail Alliance requested that the mountain bike use be restored as an allowable use on trails in the Preserve, including Mount Elijah Trail #1206, Mount Elijah Access Trail #1206A, Lake Mountain/Bigelow Lake Trail #1214 and 1214A. The letter stated that these trails were previously open to mountain bikes before the area became part of the Preserve, and that these trails provide an important connection between the Boundary Trail and the Illinois Valley area. One other commenter stated that mountain bikes should not be restricted and that mountain bikes do not degrade trails.

Equestrian Use: One comment letter noted an inconsistency between the preferred alternative's statement that visitors would continue to enjoy traditional recreation in the Preserve to the same degree that they are currently, and the restrictions the plan then puts on equestrian use. The letter states that the NPS does not provide justification for these restrictions, and cites NPS policy and scientific studies that support having no or fewer restrictions. The letter also states that these restrictions are inequitable because similar restrictions are not being proposed for other recreational users. One other commenter opined that horses do more trail damage than mountain bikes.

Fishing: One commenter noted that the plan gives the incorrect impression that fishing might be allowed in the Preserve by saying hunting and fishing are allowed within the Preserve in accordance with applicable state and federal laws, though state regulations prohibit fishing on all tributaries of the East Fork Illinois River, which includes all streams in the Monument and Preserve.

OHVs: Commenters expressed concern that Off-Highway Vehicles are continuing to travel off road within the Preserve, despite this now being a prohibited activity. Commenters were concerned about the damage to vegetation caused by these vehicles, and that hunters may be using these vehicles to retrieve game off road. Suggestions for addressing this issue included signage, education of local off-roading groups, coordination with the adjacent National Forest, improved enforcement of NPS regulations, and prohibition of OHVs on trails within the Preserve. One commenter requested that the plan provide specific actions to reduce ongoing OHV use in the Mt. Elijah/Bigelow Lakes area.

Roads: As noted earlier one comment letter disagreed with Alternative B as the Environmentally Preferable Alternative because it does not propose decommissioning Road 461066 and Road 4613057. The letter points out that the road system was designed for timber management and midslope roads are at particularly high risk for chronic annual sedimentation as well as catastrophic sedimentation during floods, and that there is no administrative or recreational use that would override this threat. The letter suggests that the park staff obtain technical assistance from Redwood National Park and consult with Pacific Watersheds on their sediment threats and remedies report for roads now in the Preserve (that report was produced for the Rogue River-Siskiyou National Forest).

Operational Suggestions: Several commenters made operational suggestions, including interpretive programming ideas, improving security, and removing abandoned barbed wire. Some commenters

suggested that the park run a shuttle bus from Cave Junction to the monument to reduce pollution, noise, and traffic. Some commenters also made suggestions for actions or facilities that are already occurring or exist in the Preserve, including hiring college students for summer positions, hiking trails around the caves, and ranger tours of the caves.

## Agency Consultation

### Oregon State Historic Preservation Office

In April 2016, the NPS sent the Oregon State Historic Preservation Officer (SHPO) a letter describing the park's intent to prepare a Preserve Management Plan, and inviting SHPO representatives to participate in the scoping process. On June 29, 2017, the NPS initiated formal written consultation under Section 106 of the NHPA with the SHPO and provided a description of the area of potential effects (APE). SHPO responded July 31, 2017, agreeing with the APE boundary.

The NPS determined that there will be *No Adverse Effect* to historic properties from the planning process for, or development of, the preserve plan and on May 23, 2018, requested SHPO concurrence with this determination for the selected alternative (Alternative B). The SHPO responded on July 6, 2018, but did not clearly concur or not concur with the no adverse effect determination. The NPS sent a follow up request for concurrence with the determination of effect to the SHPO on October 25, 2018. The SHPO did not provide a response within 30 days of receipt of the electronic submittal forms and no consulting party has objected. Therefore, the NPS can proceed with the preserve plan in accordance with 36 Part 800.5(c)(1).

Since the NPS cannot yet assess the specific effects of future projects in the Preserve Plan on historic properties, the NPS commits to conducting Section 106 compliance and continuing to consult with the SHPO, traditionally associated tribes and other consulting parties as necessary in accordance with the 2008 Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation (ACHP), and the National Conference or State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act and the ACHP's regulations (36 CFR Part 800).

### U.S. Fish and Wildlife Service

On June 29, 2017, the park sent a letter to the USFWS to inform them of the Preserve Management Plan (PMP) planning process and to initiate Section 7 consultation. Although no formal response was received, a check of the USFWS website found the listed and proposed species likely to occur in the park. That list was last updated in September 2018. Although the Preserve is likely to include two listed species (Oregon spotted frog and northern spotted owl), based on the analysis in the EA, most maintenance and visitor use activities would continue to occur in previously disturbed areas along trails, roads and in developed areas. No construction or additional disturbance would occur immediately following approval of the plan and there would be no change in habitat for or disturbance of listed species; therefore there would be no effect on Oregon spotted frogs or northern spotted owls. As a programmatic document, the Preserve plan would have no effect on these listed species because no specific actions would result from its approval. Instead, implementation plans and actions stemming from approval of the Preserve plan would be required to undergo individual Section 7 consultation as specific site plans are developed.

## Tribal Consultation

Traditionally associated tribes including The Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, Cow Creek Band of Umpqua Indians, the Tolowa Dee-ni' Nation, Karuk Tribe and the Quartz Valley Indian Community of the Quartz Valley Reservation of California have been consulted on the draft Preserve Management Plan and consultation will continue during the implementation phase of the plan. Initial input from traditionally associated tribes was sought in September 2016 during the public scoping period. Traditionally associated tribes received a copy of the draft plan in April 2018. Additionally, in-person contacts were made with members of the Cow Creek Band of Umpqua Tribe of Indians and The Confederated Tribes of Siletz Indians at a mutually attended event in April 2018. Additional consultation will take place with traditionally associated tribes during implementation of the plan's selected alternative to ensure the identification of historic properties of cultural and religious significance as required under 36 CFR 800.2 (2)(B)(ii).

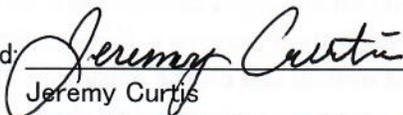
## Future Compliance Requirements

The NPS will conduct additional site-specific environmental analysis as appropriate when individual projects or actions included in the selected action are deemed ready for implementation. These pending actions and plans include: a revised fire management plan, Buck Lake primitive campsite modifications, and the potential for hardened or boardwalk trail construction at Bigelow Lakes. With each of these, the NPS will consult with the USFWS and Oregon SHPO as needed to ensure compliance with NEPA, the Section 7 of the ESA, and requirements for compliance with Section 106 of the NHPA (2008 Programmatic Agreement and 36 CFR 800).

## Finding

On the basis of the information contained in the EA as summarized above, the NPS has determined that implementing the selected action is not a major federal action nor is it an action without precedent or similar to an action that normally requires an Environmental Impact Statement (EIS). The conclusions of non-significance are supported by the conservation planning and environmental impact analysis completed and the capability of listed mitigation measures to reduce or eliminate impacts. The action will not result in any unacceptable impacts. This determination also included due consideration of the minor nature of agency and public comments. Therefore, in compliance with the National Environmental Policy Act, an EIS will not be prepared, and the plan may be implemented as soon as practicable.

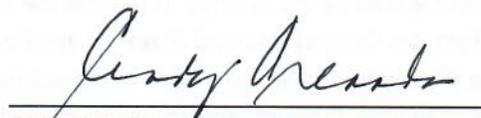
Recommended:

  
Jeremy Curtis

Superintendent, Oregon Caves National Monument and Preserve

2/12/2019  
Date

Approved:

  
Stan Austin

Regional Director, Pacific West Region

FEB 21 2018  
Date