



Protect America's Climbing

February 21, 2017

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RE: Big Creek Peregrine Falcon Seasonal Closure-Kootenai National Forest

Access Fund appreciates the efforts made by the Kootenai National Forest to protect peregrine falcon habitat at Big Creek. In 2016 a new peregrine falcon closure was issued under Order Number: D01-074-S-16. The purpose and need for this Decision is to enact a closure within an area identified as a peregrine falcon nesting area. The closure is designed to eliminate the potential disturbance from recreational climbers or other recreationists on nesting peregrine falcons within the Big Creek nesting area (Big Creek Peregrine Falcon Closure, 2016). We request the 2017 peregrine falcon closure be slightly reduced in size based on the general location of the nest and use patterns of climbers.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and over 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

Best Practices

Yosemite National Park¹, Rocky Mountain National Park², and the Arapahoe National Forest³ are great examples of well-substantiated and balanced seasonal raptor closures that utilize site specific considerations such as viewshed, monitoring, and nest location to regulate only certain cliffs or specific portions of a cliff. Researchers conclude that wildlife is less disturbed when visually shielded from human activities than otherwise. The role of visual buffers is an important concept as it can result in reduced spatial restrictions separating critical wildlife-use areas from disturbances (Orwell, 2015). The use of view sheds provides a land manager with a realistic understanding of spatial requirements. Applying view shed analysis to determining raptor closure areas results in well-informed closure areas that are both protective and minimal (Camp et al., 1997).

One study suggests, at large cliffs, such as huge rocky complexes or extensive rock faces, a partial climbing prohibition within 650 feet of nesting ledge may be sufficient (Brambilla et al., 2004). A more recent survey of raptors, suggest a tolerance for narrower disturbance buffers allowing for the delineation of irregular zones based on: 1) topography and tree density influence on visual and noise disturbances at the eyrie ledge, 2) foraging patterns, and 3) the limits of territoriality or defense behavior (Ruddock and Whitfield, 2007). Peregrines do not readily desert their eggs and seldom do so as a result of people visiting their eyries. Desertions are usually the result of prolonged disturbance which keeps the bird off the eyrie for several hours (Ratcliffe D. A., 1993). Nonthreatening activities, such as those occurring on recreational trails, may be compatible with a nest or perch location in close proximity if that activity is visually or audibly buffered by vegetation or topography (Knight and Temple, 1995).

Prior to the peregrine being delisted, recommended buffer zones typically involved circular ¼ or ½ mile buffer zone around an active nest. However, many world renowned rock climbing destinations, including but not limited to Yosemite National Park, Rocky Mountain National Park, and Arapahoe National Forest, are successfully utilizing much smaller buffer zones that are tailored to the specific topography around the nest location.

Closing specific climbs or sections of cliff within the immediate vicinity of an active nest protects nesting peregrines and minimizes public use restrictions. The size of the closure should depend on the reactions of the Peregrines to climbers, and may be influenced by the topography of the cliff. Nesting falcons are much more sensitive to people above their nest than to people below or across from it (Cade et al., 1996). The Kootenai National Forest should reconsider the size of the seasonal closure and close only the immediate area and rock outcrops with an active nest (Figure 1). This technique is

¹ See: <http://www.nps.gov/yose/planyourvisit/climbingclosures.htm>

² “Each year, from approximately March 1 through July 31, Rocky Mountain National Park initiates temporary closures in certain areas of the park to ensure birds of prey (raptors) will be undisturbed during their breeding and nesting seasons. Closure notices will also be posted at key access points in the park. As breeding and nesting data are collected, additional closures may be necessary, or closures may be lifted. When closed, the closures include the named rock formations and the areas surrounding the base of the formation. This includes all climbing routes, outcroppings, cliffs, faces, ascent and descent routes and climber’s access trails to the formation.” See http://www.nps.gov/romo/planyourvisit/area_closures.htm#CP_JUMP_435739

³ “Seasonal area closures protect nesting birds of prey from February 1 through approximately July 31 each year. The length of this closure varies each year and may be partially lifted earlier than July depending upon conditions. When in effect, signs are posted in closure areas (UFC-01-12 and Exhibit G for information on this area closure). Contact Boulder Ranger District at 303-541-2500 for current status.” See <http://www.fs.usda.gov/recarea/arp/recarea/?recid=40354>

utilized successfully at the above mentioned locations and each of these areas receive far more climber user days than the Stone Hill climbing area at Big Creek.

Recommendations

The overall seasonal closure area size at Big Creek is unnecessarily large. The 2016 closure included 288 acres surrounding the nest site, described as running from mile marker 39-37.8 on the Forest Development Road. This closure area includes multiple established climbing areas within the “Stone Hill” climbing area (Figure 1). Many of the climbing crags affected by this closure are approximately ¼ to ½ mile northeast of the 2016 nesting site and outside of the view-shed of the nest, shielded by a ridge (Figure 1). We request that special consideration be given this 2017 season in reducing the size of the closure once the nest site has been established, see Figure 1 for suggested boundary shift.

Table 1. Recommended climbing areas to remain open through the seasonal closure based on their location 1/4-1/2 mile northeast of the nesting site and out of the view shed of the nest location (Figure 1)

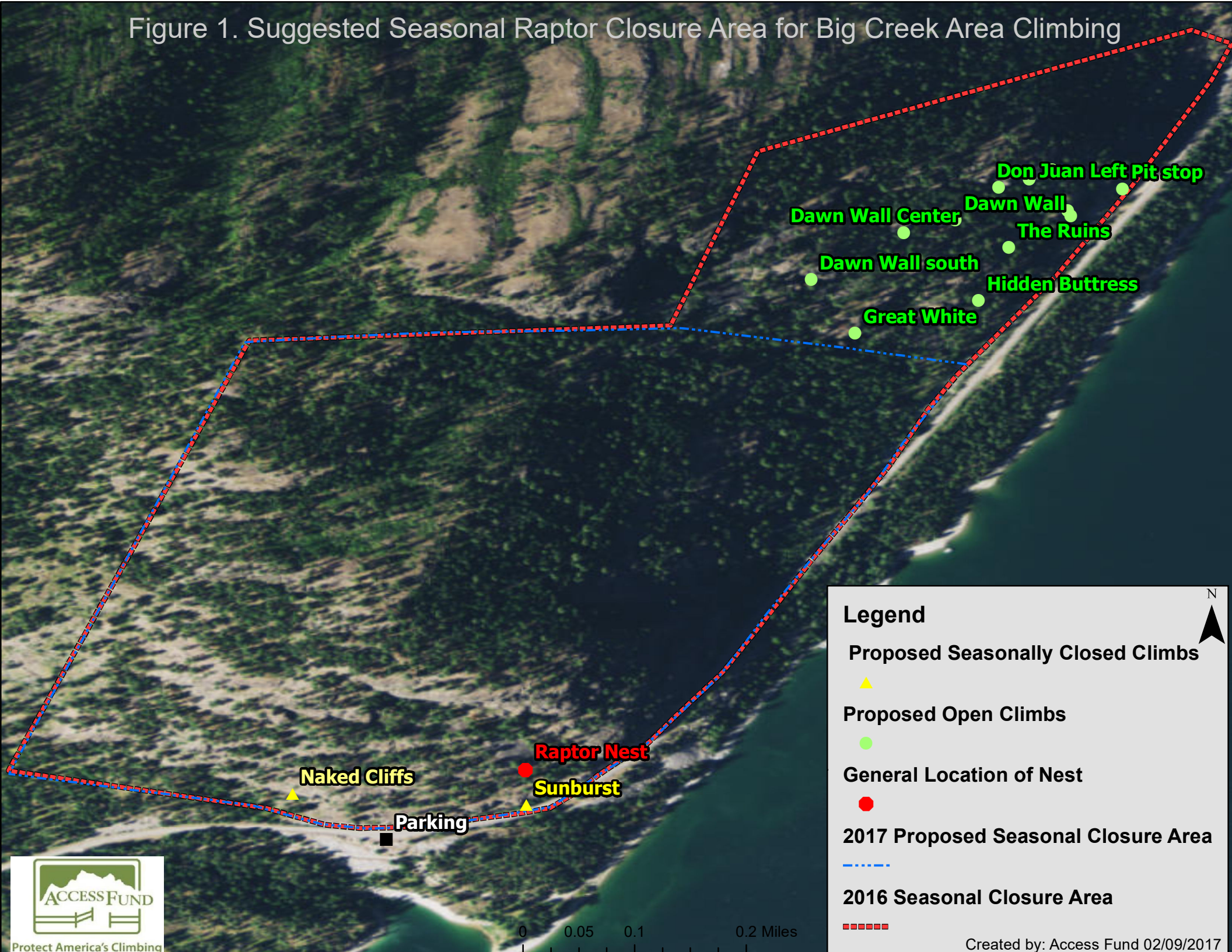
<i>Climbing Crag Name</i>	<i>Latitude/Longitude Position</i>
Dawn Wall	48°45'14.09"N, 115°18'30.09"W
Great White	48°45'8.80"N, 115°18'34.78"W
Don Juan	48°44'46.23"N, 115°18'52.58"W
The Ruins	48°45'13.62"N, 115°18'26.80"W
Grandstand	48°45'14.27"N, 115°18'24.70"W
Pit stop	48°45'16.83"N, 115°18'20.84"W

Table 2. Recommended climbing areas appropriate for seasonal closure based on proximity to the 2016 nest location (Figure 1)

<i>Climbing Crag Name</i>	<i>Latitude/Longitude Position</i>
Sunburst	48°44'46.23"N, 115°18'52.58"W
Naked Cliffs	48°44'47.29"N, 115°19'1.06"W

Local climbers in the area are willing to volunteer their time to help the Kootenai National Forest effectively manage climbing and raptor protection. The Kootenai National Forests management strategy should follow the above examples and ongoing monitoring can provide important data that allows the closure to be re-opened or re-shaped based on the location and status of an active nest. If no nesting occurs or a nest fails, the area can be re-opened. Similarly, a closure can be lifted early following a successful fledge. Continued monitoring minimizes access restrictions and provides valuable information regarding peregrines in the area. Rock climbers have a long history of contributing their expertise to the research, conservation and management of many species, including the peregrine falcons. It is our hope that the Kootenai National Forest will continue this traditional in the spirit of cooperative conservation efforts.

Figure 1. Suggested Seasonal Raptor Closure Area for Big Creek Area Climbing



Conclusion

The Access Fund and local climbing community can assist land managers efforts to conserve raptor habitat. Protecting nesting raptors is extremely important and climbers regularly volunteer their time to help properly manage cliff nesting raptors. The 2016 Big Creek seasonal closure period (April 26th through August 2nd) was reasonable, but should be subject to opening earlier or starting later, depending the success or failure of the nest. Further, the size of the buffer zone should be reduced to the rock formations with an active nest and the areas surrounding the base of the formation (including all climbing routes, outcroppings, cliffs, faces, ascent and descent routes and climber's access trails to the formation). Such closures are used effectively across the country, proven to protect nesting peregrines, allow for better monitoring, and minimize access restrictions.

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Access Fund Assistance

Access Fund strives to work with local climbers and land managers to address resource management needs. We provide training on planning and stewardship best practices to keep those areas healthy. We assist in educating climbers on seasonal closures, actively posting seasonal closures to public web based forums, and can help develop signs to ensure closures are understood and observed by climbers. Thank you for considering our comments. Access Fund has the experience, local contacts, and resources to assist planners craft alternatives that protect peregrine falcons and limit access restrictions. We look forward to a continued partnership with the Kootenai National Forest. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin
Access Fund, Public Lands Associate

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